State of Delaware v. JOHN L BRISCO

State's Atty: PERIANN DOKO , Esq.

Defense Atty: MICHAEL C HEYDEN , Esq.

DOB: 08/11/1997

AKA: JOHN BRISCO JOHN BRISCO

Co-Defendants: JACQUEZ ROBINSON , JACQUEZ ROBINSON Co-Defendants: KADIR MCCOY , ALEXANDER FITZGERALD Co-Defendants: AQUANTAY GARNER , RYLIER GRAYSON Co-Defendants: RONALD MADDREY , RONALD MADDRAY Co-Defendants: AQUANTAY GARNER, RAYMIRE BRISCOE Co-Defendants: JAYMERE WHITE , JOHN BRISCO

Co-Defendants: DAYMERE WISHER , RAYMIRE BRISCOE Co-Defendants: TYMERE RIGHTER , AQUANTAY GARNER Co-Defendants: KADIR MCCOY , BRYANT HAWKES

Co-Defendants: JACQUEZ ROBINSON , RANDY SCOTT

Co-Defendants: RONALD MADDREY , ALEXANDER FITZGERALD

Co-Defendants: DEJUAN ROBINSON , DEJUAN ROBINSON

Assigned Judge: CARPENTER WILLIAM C JR.

Charges	
CHALGES	÷

Count	DUC#	Crim.Action#	Description	Dispo.	Dispo. Date
001	1502007987	IN15020908	PROH FIREARM	NOLP	07/20/2015
002	1502007987	IN15020909	PROH FIREARM	NOLP	07/20/2015
003	1502007987	IN15020910	RE STOL FIREARM	NOLP	07/20/2015
004	1502007987	IN15020911	PROH FIREARM	NOLP	02/25/2015
005	1502007987	IN15020912	PROH FIREARM	NOLP	02/25/2015
006	1502007987	IN15071239	PROH FIREARM	NOLP	08/31/2015
007	1502007987	IN15071240	PFBPP W/ PFA	NOLP	08/31/2015
800	1502007987	IN15071241	PFBPP W/ PFA	NOLP	08/31/2015
009	1502007987	IN15071242	RE STOL FIREARM	NOLP	08/31/2015
010	1502007987	IN15071243	PROH FIREARM	NOLP	08/31/2015
011	1502007987	IN15071244	PROH FIREARM	NOLP	08/31/2015
012	1502007987	IN15021589	HNDGUN PROH JUV	NOLP	11/09/2015
013	1502007987	IN15021590	PFBPP PABPP	NOLP	11/09/2015
014	1502007987	IN15081701	PFBPP PABPP	NOLP	11/09/2015
015	1502007987	IN15081702	RE STOL FIREARM	NOLP	11/09/2015
016	1502007987	IN15081697	HNDGUN PROH JUV	NOLP	11/09/2015
017	1502007987	IN15081698	PROH FIREARM	NOLP	11/09/2015
018	1502007987	IN15081699	PROH FIREARM	NOLP	11/09/2015
019	1502007987	IN15081700	RE STOL FIREARM	NOLP	11/09/2015
020	1502007987	IN15081705W	MURDER 1ST	NOLP	11/09/2015
021	1502007987	IN15081706W	GANG PARTICP.	NOLP	11/09/2015
022	1502007987	IN15081707W	PFDCF	NOLP	11/09/2015
023	1502007987	IN15081708W	MURDER 1ST	NOLP	11/09/2015
024	1502007987	IN15081709W	PFDCF	NOLP	11/09/2015
025	1502007987	IN15081710W	ATT ROBBERY 1ST	NOLP	11/09/2015
026	1502007987	IN15081711W	PFDCF	NOLP	11/09/2015
027	1502007987	IN15081712W	CONSP 2ND	NOLP	11/09/2015
028	1502007987	IN15081713W	PROH FIREARM	NOLP	11/09/2015
029	1502007987	IN15081714W	MURDER 1ST	NOLP	11/09/2015
030 031	1502007987 1502007987	IN15081715W IN15081716W	PFDCF CONSP 1ST	NOLP NOLP	11/09/2015 11/09/2015
0.01	1302007307	T14T300T/T0M	COMPL IDI	110111	11/05/2015

032 033 034 035	1502007987 1502007987 1502007987 1502007987	IN15081717W IN15081703 IN15081704 IN15081718	PROH FIREARM MURDER 1ST PFDCF CONSP 1ST	NOLP NOLP NOLP NOLP	11/09/2015 11/09/2015 11/09/2015 11/09/2015	
	1502007987	IN15081718 IN15081719	PROH FIREARM	NOLP	11/09/2015	
036	1502007987	IN15061719 IN15110677	GANG PARTICP.	NOLLE	11/09/2015	
037						
038	1502007987	IN15110678	MURDER 1ST			
039	1502007987	IN15110679	PFDCF			
040	1502007987	IN15110680	MURDER 1ST			
041	1502007987	IN15110681	PFDCF			
042	1502007987	IN15110682	ATT ROBBERY 1ST			
043	1502007987	IN15110683	PFDCF			
044	1502007987	IN15110684	CONSP 2ND			
045	1502007987	IN15110685	PFBPP PABPP			
046	1502007987	IN15110686	HNDGUN PROH JUV			
047	1502007987	IN15111261	HNDGUN PROH JUV			
048	1502007987	IN15111262	PROH FIREARM			
049	1502007987	IN15111263	MURDER 1ST			
050	1502007987	IN15111264	PFDCF			
051	1502007987	IN15111265	CONSP 1ST			
052	1502007987	IN15111266	PFBPP PABPP			
053	1502007987	IN15111304	MURDER 1ST			
054	1502007987	IN15111305	PFDCF			
055	1502007987	IN15111306	CONSP 1ST			
056	1502007987	IN15111307	PFBPP PABPP			
057	1502007987	IN15111308	HNDGUN PROH JUV			
058	1502007987	N15111309	MURDER 1ST			
059	1502007987	N15111310	CONSP 1ST			
060	1502007987	IN15111311	RE STOL FIREARM			
061	1502007987	IN15111312	HNDGUN PROH JUV			
062	1502007987	IN15111313	PROH FIREARM			
063	1502007987	N15111314	HNDGUN PROH JUV			
064	1502007987	N15111315	HNDGUN PROH JUV			
065	1502007987	N15111316	HNDGUN PROH JUV			
No.	Event Date Event	Docket Add Date	e 	Judge		
1	02/16/2015 INDICTMENT, TR SCHEDULED FOR	02/18/2015 RUE BILL FILED NO ARRAINGMENT 2/24	0.87 4/2015 & CASE REVI	EW 04/06/20)15	
	02/24/2015			AVALA MARK		
			ANT WAIVED READING		PLEA OF NOT	
			ATALIE HASKINS, ES			
	02/24/2015		V	AVALA MARK	S	
	BAIL REDISTRIE	BUTED.				
	CASH BAIL		35,000.00			
		IS REMAIN THE SAI				
2	02/24/2015			AVALA MARK		
			ORRECTION. BAIL RE	DISTRIBUTEI).	
3	, ,					
	NOLLE PROSEQUI	FILED BY ATTOR	NEY GENERAL			

DOB: 08/11/1997 State of Delaware v. JOHN L BRISCO State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO Event Date Docket Add Date Judge Event RSN: DISPOSITION OTHER COURT. 05/19/2015 05/19/2015 CASE ACCEPTED IN SUPERIOR COURT. ARREST DATE: 02/12/2015 DEFENDANT FOUND NON AMENABLE IN FAMILY COURT ON 05/01/15 BAIL: CASH BAIL 35,000.00 100% 07/16/2015 07/16/2015 5 MOTION TO DISMISS FILED. BY NATALIE HASKINS, ESQ SCHED FOR 07/27/15 @1:30 07/20/2015 07/22/2015 6 REINDICTMENT - TRUE BILL FILED.NO 98 07/27/2015 07/27/2015 MOTION TO DISMISS RULED AS MOOT. CASE INDICTED ON 07/20/15 07/28/2015 07/28/2015 PARKER LYNNE M ARRAIGNMENT CALENDAR - DEFENDANT WAIVED READING; ENTERED PLEA OF NOT GUILTY; JURY TRIAL DEMANDED BY NATALIE HASKINS, ESQ. 07/28/2015 07/28/2015 PARKER LYNNE M BAIL MODIFIED. BAIL NOW SET AT 47,500.00 CASH BAIL BAIL CONDITIONS REMAIN THE SAME. 07/28/2015 07/28/2015 PARKER LYNNE M COMMITMENT TO DEPARTMENT OF CORRECTION. BAIL IS SET AT \$47,500.00 CASH. 07/31/2015 07/31/2015 SCHEDULING ORDER ISSUED THE FOLLOWING COURT DATES ARE ESTABLISHED: (A) FIRST CASE REVIEW 08/17/2015 (B) FINAL CASE REVIEW 11/16/2015 (C) TRIAL 12/01/2015 08/17/2015 08/17/2015 COOCH RICHARD R CASE REVIEW CALENDAR: SET FOR FINAL CASE REVIEW. 08/27/2015 08/27/2015 9 EMAIL FILED FROM P. DOKO, DAG RE: THE ORDER PAGE IS ATTACHED FOR THE MOTION TO TO TRANSFER THE DETENTION OF BRISCO FROM NEW CASTLE COUNTY DETENTION CENTER TO THE DEPARTMENT OF CORRECTION. (ORDER WILL BE PRESENTED ON 09/01)

BAIL POSTED IN THE AMOUNT OF \$47,500 CASH AMERICAN FUNDING

08/27/2015 08/27/2015

08/27/2015 08/27/2015

10

11

State of Delaware v. JOHN L BRISCO DOB: 08/11/1997

State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO

12

Event Date Docket Add Date

Judge

Event

RELEASE

08/31/2015 09/01/2015

REINDICTMENT - TRUE BILL FILED.NO 100

ARRAIGNMENT 09/15/2015 AT 9:30

08/31/2015 09/02/2015

CASE CONSOLIDATED WITH: 1508021784

RULE 9 WARRANT ISSUED UNDER CASE#1508021784 (CG)

08/31/2015 09/02/2015

CASE CONSOLIDATED WITH: 1508021144

09/03/2015 09/04/2015 13

MEMO SPECIALLY ASSIGNING MURDER CASE.

TO: JUDGE CARPENTER

THE ABOVE NON-CAPITAL 1ST DEGREE MURDER CASES ARE SPECIALLY ASSIGNED TO YOU FOR ALL PURPOSES UNTIL FINAL DISPOSITION. THE DEFENDANTS WERE INDICTED ON AUGUST 31, 2015.

THE HONORABLE JAN R. JURDEN

09/08/2015 14

09/08/2015

MEMORANDUM FILED, CONSOLIDATION NOTICE FAXED TO CENTRAL RECORDS FOR HRYCI. HRYCI. 09/09/2015 09/10/2015

15

MOTION TO BE RELIEVED AS BONDSPERSON FILED.

BY AMERICAN FUNDING

SCHED FOR 09/14/15 @1:30

16 09/14/2015 09/14/2015

VAVALA MARK S

MOTION TO BE RELIEVED AS BONDSPERSON GRANTED.

09/15/2015 09/15/2015

PARKER LYNNE M

BAIL MODIFIED. BAIL NOW SET AT

CASH BAIL

250,000.00

HELD WITHOUT BAIL

0.00

BAIL CONDITIONS REMAIN THE SAME.

17

09/15/2015

PARKER LYNNE M

COMMITMENT TO DEPARTMENT OF CORRECTION. DEFENDANT HELD WITHOUT BAIL. ON MURDER 1ST CHARGE(S) AND \$250,000.00 CASH ON REMAINING CHARGES.

09/15/2015

09/15/2015

PARKER LYNNE M

ARRAIGNMENT CALENDAR - DEFENDANT WAIVED READING; ENTERED PLEA OF NOT GUILTY; JURY TRIAL DEMANDED MICHAEL HEYDEN, ESQ.

09/15/2015 09/16/2015 18

CASH BAIL REFUND IN THE AMOUNT OF \$ 47,500.00 TO: AMERICAN FUNDING, PICK-UP BY ALEX MOYE.

10/21/2015 19

10/21/2015

EMAIL FILED FROM T. WALLS-PULLING TO COUNSEL

RE: OFFICE CONFERNCE SCHEDULED FOR 11/16/2015 AT 1PM. PLEASE MARK

State of Delaware v. JOHN L BRISCO DOB: 08/11/1997

State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO

No.

Event Date Docket Add Date

Event

YOUR CALENDARS.

11/06/2015 11/17/2015 21

LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ.

LETTER DATED: 11/5/2015.

RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16, THE FOLLOWING INFORMATION CONCERNING THE ABOVE CAPTIONED CASE IS BEING SUPPLIED. ENCLOSED PLEASE FIND 1 DISC LABELED "REDACTED POLICE REPORTS" CONTAINING THE FOLLOWING:

- WPD COMPLAINT NO. 30-13-008568...
- COMPLAINT NO. 30-14-035123...
- COMPLAINT NO. 30-14-035149...
- COMPLAINT NO. 30-14-059484...
- *** SEE FULL LETTER IN FILE ***
- 20 11/09/2015 11/17/2015

REINDICTMENT - TRUE BILL FILED.NO 75

ARRAIGNMENT 12/01/2015 AT 9:30

23 11/12/2015 11/25/2015

> LETTER FROM: IPEK MEDFORD, DAG, TO: MICHAEL HEYDEN, ESQ, DATED 11/10/15.

RE: IN REGARDS TO THE ABOVE-CAPTIONED MATTERS, ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

- 1. ONE(1) CERTIFIED COPY OF THE JUDGMENT IN A CRIMIANAL CASE FOR FEDERAL CASE NUMBER 13-CR-00114-SLR, DEFENDANT BRYANT HAWKES (6 PAGES); 2, ONE(1) DVD CONTAINING THE MVR OF RONALD MADDRAY'S 04/28/2015 ARREST BY ELSMERE POLICE DEPARTMENT; AND.....
- *** SEE FULL LETTER IN FILE ***
- 24 11/12/2015

11/25/2015

LETTER FROM: IPEK MEDFORD, DAG, TO: THE HONORABLE WILLIAM CARPENTER, DATED 11/12/15.

RE: IN ANTICIPATION OF THE NOVEMBER 16, 2015 OFFICE CONFERENCE, THE STATE IS PROPOSING THE FOLLLOWING TRIAL GROUPINGS:.....

*** SEE FULL LETTER IN FILE ***

22 11/16/2015 11/17/2015 CARPENTER WILLIAM C JR.

CONFERENCE HELD BEFORE JUDGE CARPENTER. CASES ARE TO BE GROUPED AS FOLLOWS: GROUP 1: J. BRISCOE 1502007987, D. WISHER 1508021812, & K. MCCOY 1501018069. GROUP 2: R. BRISCOE 1505024834, J. WHITE 1508015000, & T. RIGHTER 1508021828. GROUP 3: A. FITZGERALD 1503016511, A. GARDNER 1504005092, & R. GRAYSON 1504005579. GROUP 4: R. MADDREY 1504004537, D. ROBINSON 1507017043, & J. ROBINSON 1411005041. GROUP 5: R. SCOTT 1508021944 & B. HAWKES 1508021938. JUDGE CARPENTER IS TO SET DEADLINES FOR MOTION TO SEVER FOR EACH GROUP AND ANY MOTIONS TO OBJECT TO THE GROUPING. ONCE GROUPS ARE FINALIZED,

State of Delaware v. JOHN L BRISCO

DOB: 08/11/1997

State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO

Event Date Docket Add Date

Event

TRIAL DATES AND OTHER DEADLINES ARE TO BE ESTABLISHED.

29

11/16/2015 12/08/2015

LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ.

LETTER DATED: 11/13/2015.

RE: ENCLOSED PLEASE FIND 1 DISC LABELED "PRISON MAIL 11/12/15" WHICH MAY HAVE BEEN INADVERTENTLY OMITTED FROM THE STATE'S DISCOVERY PACKET PROVIDED TO YOU ON NOVEMBER 5, 2015, AND WHICH WAS IDENTIFIED THEREIN AS "DISC NUMBER 15". THIS DISC IS LABELED "PRISON MAIL" AND CONTAINS REDATCED PRISON MAIL OF THE FOLLOWING DEFENDANTS:

A. BRISCO, JOHN

B. BRISCOE, RAYMIRE...

*** SEE FULL LETTER IN FILE ***

CARPENTER WILLIAM C JR. 11/25/2015 11/30/2015 25 LETTER FROM JUDGE CARPENTER TO ALL COUNSEL OF RECORD RE: AT OUR CONFERENCE ON 11/16/2015, THE STATE DISCLOSED THE DEFENDANT GROUPINGS IT WOULD LIKE THE COURT TO CONSIDER IN TRYING THE ABOVE-CAPITIONED MATTERS. THE COURT INDICATED IT WOULD SCHEDULE A DEADLINE FOR OBJECTIONS TO THE INCLUSION OF A PARTICULAR DEFENDANT IN A GROUPING AND THAT THE DEADLINE WOULD BE 12/18/2015. IF YOU HAVE NOT FILED AN OBJECTION BY THAT DATE, THE COURT WILL ASSUME YOU ARE SATISFIED WITH THE STATES PROPOSED GROUPING OF YOUR DEFENDANT. OBVIOUSLY IF YOU OBJECT, PLEASE ARTICULATE THE REASON WHY AND BE PRECISE AS POSSIBLE, RECOGNIZING THAT DISCOVERY HAS ONLY RECENTLY BEEN

12/01/2015 VAVALA MARK S 12/01/2015 ARRAIGNMENT CALENDAR - DEFENDANT WAIVED READING; ENTERED PLEA OF NOT GUILTY; JURY TRIAL DEMANDED BY MICHAEL HEYDEN, ESQ.

PROVIDED. ONCE THE GROUPINGS ARE ESTABLISHED, THE COURT WILL BEGIN THE

26 12/01/2015

12/01/2015

VAVALA MARK S

BAIL MODIFIED. BAIL NOW SET AT

PROCESS OF ASSIGNING TRIAL DATES.

CASH BAIL

127,000.00

HELD WITHOUT BAIL

0.00

BAIL CONDITIONS REMAIN THE SAME.

12/01/2015 12/01/2015 VAVALA MARK S 27 COMMITMENT TO DEPARTMENT OF CORRECTION. BAIL IS SET AT \$127,000.00 CASH. DEFT IS ALSO HELD WITHOUT BAIL ON A CHARGE(S).

12/01/2015 12/01/2015

VAVALA MARK S

RELEASE FILED AND FAXED ON ALL CHARGES PREVIOUSLY NOLLE PROSSED.

12/16/2015 12/22/2015 30

LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ.

LETTER DATED: 12/16/2015.

RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16(A)(1)(E), ENCLOSED

State of Delaware v. JOHN L BRISCO

DOB: 08/11/1997

State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO

No.

Event Date Docket Add Date

Judge

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PLEASE FIND 1 COPY OF EACH OF THE BELOW LISTED SUPPLEMENTAL ITEMS PREPARED IN CONNECTION WITH THE ABOVE REFERENCED CASE BY RJ LEE GROUP: 1. 1 REDACTED COPY OF THE RJ LEE GUNSHOT RESIDUE ANALYSIS RELATED TO COMPLAINT NO. 30-15-7520...

2. 1 COPY OF THE RJ LEE GUNSHOT RESIDUE ANALYSIS RELATED TO COMPLAINT NO. 30-15-38102...

*** SEE FULL LETTER IN FILE ***

12/29/2015 31

12/31/2015

CARPENTER WILLIAM C JR.

LETTER TO COUNSEL FROM JUDGE CARPENTER ON 11/24/2015, THE COURT SET A DEADLINE OF 12/18 FOR COUNSEL TO RESPOND AS TO WHETHER THERE WERE ANY OBJECTIONS TO THE GROUPINGS THAT THE STATE HAD PROPOSED IN ITS LETTER OF 11/12/2015. IN RESPONSE TO THE LETTER, THE COURT RECEVIED LETTERS FROM BRIAN JORDAN, ESQ ON BEHALF OF BRYANT HAWKES AND DANA REYNOLDS, ESQUIRE ON BEHALF OF RANDY SCOTT INDICATING THEIR OBJECTIONS TO THE GROUPINGS THAT HAVE BEEN MADE. WHILE NEITHER FILED FORMAL MOTIONS TO SEVER, THEIR LETTERS WOULD APPEAR TO INDICATE THEY WILL BE ASKING FOR SEVERANCE OF THEIR CLIENTS CASES FROM THE LARGER INDICTMENT. THE COURT HAS RECEIVED MOTIONS TO SEVER FROM ROBERT VRANA, ESQ ON BEHALF OF RONALD MADDREY, PETER VEITH, ESQUIRE ON BEHALF OF AQUANTAY GARDENER AND GERALD HAGER, ESQ ON BEHALF OF JAYMERE WHITE, ALL REQUESTING SEVERANCE OF THEIR CLIENTS CASES FROM THE GROUPING AND TO ALLOW THEIR CASES TO BE TRIED SEPARATELY.

SINCE THE COURT'S PREVIOUS LETTER ONLY REQUESTED AN INDICATION WHETHER COUNSEL OBJECTED TO THE PARTICULAR GROUPINGS, IT DID NOT SET A DEADLINE FOR AN ACTUAL SEVERANCE MOTION. IN ORDER FOR US TO HANDLE ALL OF THE POTENTIAL SEVERANCE ISSUES AT ONCE, THE COURT IS SETTING A DEADLINE OF 1/15/2016 FOR THE FILING OF ANY ADDITIONAL MOTIONS TO SEVER. IF NO NEW MOTIONS ARE FILED BY THAT DEADLINE, THE COURT WILL ASSUME THAT THOSE DEFTS ARE NOT OBJECTING TO THE GROUPING IN WHICH THEY HAVE BEEN PLACED AND THERE IS NO GOOD-FAITH BASIS TO REQUEST A SEVERANCE FROM THE OTHER DEFTS IN THEIR GROUPS. THE STATE WILL HAVE UNTIL FEB 5, 2016 TO RESPOND TO ALL MOTIONS THAT HAVE BEEN FILED AS WELL AS ALL LETTER CORRESPONDENCE OBJECTING TO THE GROUPINGS.ONCE THE PENDING MOTIONS ARE RESOLVED, THE ACTUAL TRIAL DATE FOR THOSE THAT REMAIN IN THE GROUPS WILL BE ESTABLISHED.

JUDGE CARPENTER

32

08/03/2016

LETTER FROM: IPEK K. MEDFORD, DAG. TO: MICHAEL HEYDEN, ESQ. RE: STATE V. JOHN BRISCO, I.D. NO. 1502007987.

DEAR MR. HEYDEN:

DUE TO THE VOLUMINOUS AMOUNT OF DISCOVERY ITEMS TO BE PROVIDED IN THE

State of Delaware v. JOHN L BRISCO

DOB: 08/11/1997

State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO

Event Date Docket Add Date

Judge

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ABOVE-CAPTIONED CASE THE STATE IS PROVIDING THE BELOW LISTED DOCUMENTS TO YOU VIA DROPBOX:

****SEE FILE FOR FULL LETTER****

08/03/2016 08/03/2016 33

CARPENTER WILLIAM C JR.

LETTER FROM JUDGE CARPENTER TO COUNSEL I HAVE RECENTLY REVIEWED THE TRANSCRIPTS OF THE HEARING HELD BACK IN MAY AND HAVE CONSIDERED THE VARIOUS MOTIONS TO SEVER WHICH HAVE BEEN FILED. AS A RESULT OF THIS REVIEW, THE COURT BELIEVES THE REAL ISSUE HERE IS NOT WHETHER DEFENDANTS WILL BE SEVERED OUT TO BE TRIED SEPARATELY BUT RATHER, WHICH WHOM EACH SHOULD BE GROUPED FOR TRIAL... IF A DEFENDANT IN GROUP TWO OR THREE HAS FILED A MOTION TO SEVER, THAT MOTION IS DENIED AT THIS TIME....FOR THE REASONS NOTED ABOVE, MR. HAWKES'S MOTION TO SEVER IS DENIED.

SEE FULL LETTER IN FILE

34 08/04/2016 08/05/2016

LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ. LETTER DATED: 8/4/2016.

RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16 (A)(1)(E), ENCLOSED PLEASE FIND ONE DISC CONTAINING ONE COPY OF EACH OF THE BELOW LISTED SUPPLEMENTAL ITEMS PREPARED IN CONNECTION WITH THE ABOVE REFERENCED CASE:

- 1. THE FORENSIC CASE REPORT FOR BODE CELLMARK CASE #: CCC1547-0432 DATED DECEMBER 18, 2015, PREPARED BY CHRISTINA NASH, MSFS, DNA ANALYST I, OF BODE CELLMARK FORENSICS (7 PAGES)...
- *** SEE FULL LETTER IN FILE ***

08/10/2016 35

08/10/2016

EMAIL FILED TO COUNSEL FROM T. WALLS-PULLING REGARDING THE TRIAL SCHEDULED TO BEGIN ON 10/11/16, THERE ARE A FEW DAYS IN OCTOBER AND NOVEMBER WHEN THE TRIAL WILL NOT BE HELD OR WILL END EARLY. JUDGE CARPENTER WANTED YOU TO BE AWARE OF THEM SO YOU MAY PLAN ACCORDINGLY. HERE ARE THE DATES:

10/14/16 - NO TRIAL

10/26 & 10/27 - JUDICIAL RETREAT BEING HELD

11/3/16 - TRIAL WILL END EARLY FOR MANDATORY JUDGES MEETING IN KENT COUNTY SCHEDULED FOR 3 PM

08/11/2016 36

08/12/2016

LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ. LETTER DATED: 8/10/2016.

RE: ENCLOSED PLEASE FIND ONE DISC CONTAINING THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

1. ONE COPY OF THE FORENSIC FIREARMS REPORT RELATED TO COMPLAINT 33-14-005650, PREPARED BY CARL RONE, FIREARMS AND TOOL MARK EXAMINER,

State of Delaware v. JOHN L BRISCO

DOB: 08/11/1997

State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO

Event Date Docket Add Date

Judge

Event

OF THE DELAWARE STATE POLICE FORENSIC FIREARMS UNIT, DATED NOVEMBER 11, 2015 (28 PAGES)...

*** SEE FULL LETTER IN FILE **

08/19/2016 08/24/2016 38

LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ RE: LETTER DATED 8/19/16.

ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITMES:

- 1. ONE(1) DISC CONTAINING THE OFFICE OF THE CHIEF MEDICAL EXAMINER'S ENTIRE LITIGATION PACKET FOR DNA15-48 LITIGATION PACKET;
- 2. ONE(1) DISC LABELED "REDACTED 911 CALLS, RECOM AND CAD REPORTS CD#1 OF 2", WHICH CONTAINS ONE(1) COPY OF EACH OF THE FOLLOWING:
 - A. REDACTED 911 CALLS, RECOM AND CAD REPORT (11 PAGES) RELATING TO COMPLAINT NUMBER 30-13-8568...

SEE FULL LETTER IN FILE

37

08/23/2016 08/24/2016

LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ RE: LETTER DATED 8/23/16.

DUE TO THE AMOUNT OF CELL PHONE EXTRACTIONS AND FILES IN THE ABOVE-CAPTIONED CASE, THE STATE IS PROVIDING THE BELOW LISTED FOLDERS AND THE EXTRACTIONS TO YOU VIA DROPBOX:

- 1. "BRISCO, JOHN HTC PHONE DUMP" CONTAINING 1,894 IMAGES AND ONE EXTRACTION REPORT (277 PAGES);
- 2. "BRISCO, RAYMIRE" CONTAINING THE CELL PHONE EXTRACTION OF ONE(1) APPLE IPHONE 5C, SERIAL NUMBER: FCCNR1DEG07M, ALSO INCLUDING BUT... ***SEE FULL LETTER IN FILE***

08/24/2016 40

09/07/2016

ORDER: PROTECTIVE ORDER IS NECESSARY TO BALANCE THE STATE'S INTERESTS IN SAFEGUARDING THE IDENTITY OF ITS CIVILIAN WITNESSES WITH THE NEED TO PERMIT DEFTS' COUNSEL TO PREPARE EFFICIENTLY FOR TRIAL AND TO FURTHER ENCOURAGE THE, EXCHANGE OF INFORMATION BETWEEN THE PARTIES THAT WOULD OTHERWISE NOT BE DISCOVERABLE PURSUANT TO S.C. CRIM RULE 16, (SEE FULL ORDER)

IT IS SO ORDERED BY JUDGE CARPENTER

39 08/30/2016 09/01/2016

LETTER FROM: JOHN DOWNS, DAG TO: JUDGE CARPENTER, DATED 8/26/2016. RE: TRIAL IS SCHEDULED TO BEGIN FOR THIS MATTER ON OCTOBER 11, 2016. THE STATE, IN ITS ON-GOING INVESTIGATION, HAS OBTAINED STATEMENTS FROM INDIVIDUALS SAYING THAT JOHN BRISCO AND KADIR MCCOY HAVE CONFESSED TO THEM THEIR ROLE IN THE MURDERS OF WILLIAM ROLLINS AND DEVON LINDSEY, FOR WHICH THEY ARE CO-DEFENDANTS. THE INFORMATION THAT WILL BE OFFERED WOULD CREATE A BURTON ISSUE IN THE TRIAL OF THE TWO DEFENDANTS TOGTHER. THE STATE SUGGESTS AS AN ALTERNATIVE TO SEVERANCE, IT WOULD

DOB: 08/11/1997 State of Delaware v. JOHN L BRISCO State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO Event Date Docket Add Date Judge Event BE POSSIBLE TO TRY THE DEFENDANTS AT THE SAME TIME WITH TWO JURIES... *** SEE FULL LETTER IN FILE *** 09/02/2016 09/08/2016 41 LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ. LETTER DATED: 9/2/2016. RE: THE BELOW LISTED REDACTED TRANSCRIPTS ARE AVAILABLE VIA THE FOLLOWING DROPBOX LINK: HTTPS://WWW.DROPBOX.COM... 1. WITNESS A, DATED 12/02/2014 (12 PAGES); 2. WITNESS B, DATED 02/27/2013 (5 PAGES); 3. WITNESS C, DATED 02/27/2013 (9 PAGES); 4. WITNESS D, DATED 01/26/2015 (7 PAGES)... *** SEE FULL LETTER IN FILE *** 09/14/2016 09/14/2016 42 OFFICE CONFERENCE PROCEEDING HELD BEFORE JUDGE CARPENTER AND COUNSEL NEW TRIAL DATE 3/6/17 - 4 WEEKS TRANSCRIPT SEALED 09/26/2016 09/26/2016 43 CARPENTER WILLIAM C JR. LETTER FROM: JUDGE CARPENTER TO: ALL COUNSEL OF RECORD RE: LETTER DATED 09/23/16 ON SEPTEMBER 14, 2016, THE COURT HELD A CONFERENCE WITH COUNSEL FOR THE DEFENDANTS INITIALLY SCHEDULED TO BE IN THE FIRST TRIAL GROUPING SET FOR OCTOBER 11, 2016. BASED UPON THE INFORMATION PROVIDED TO THE COURT AT THAT CONFERENCE, THE TRIAL OF THE FIRST GROUP HAS BEEN POSTPONED TO MARCH 6, 2017.... ***SEE FULL LETTER IN FILE*** 10/03/2016 10/06/2016 44 LETTER FROM: IPEK MEDFORD, DAG TO: MICHAEL HEYDEN, ESQ RE: LETTER DATED 10/3/16. ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS: 1. ONE(1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S LABORATORY REPORT NUMBER: 2015-01288-6, DATED SEPTEMBER 22, 2016 (13 PAGES); 2. ONE(1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S LEAD REPORT FOR CASE ID NUMBER 281D-BA-6122070 (18 PAGES); 3. ONE(1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S EVIDENCE DATA-LOADING FORM FOR CASE ID NUMBER 281D-BA-6122070 (6 PAGES)... ***SEE FULL LETTER IN FILE*** 12/21/2016 45 12/20/2016

REFERRED TO JUDGE CARPENTER ON 12/21/16 46 01/17/2017 01/23/2017

BY MICHAEL HEYDEN, ESQ

MOTION TO SEVER CHARGES FILED.

DOB: 08/11/1997

Page 11

State of Delaware v. JOHN L BRISCO

State's Atty: PERIANN DOKO , Esq. AKA: JOHN BRISCO Defense Atty: MICHAEL C HEYDEN , Esq. JOHN BRISCO

No.

Event Date Docket Add Date

Judge

Event

LETTER FROM: JOHN W. DOWNS, DAG TO: MICHAEL HEYDEN, ESQ.

LETTER DATED: 01/13/2017

RE: ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS: 1. ONE(1) CD CONTAINING THE 3/24/15 RECORDED STATEMENT OF CO-DEFENDANT ALEXANDER FIZGERALD; AND

- 2. ONE(1) CD CONTAINING THE FOLLOWING SUPPLEMENTAL FORENSIC FIREARMS REPORTS:
- 2A. ONE(1) COPY OF THE FORENSIC FIREARMS REPORT LAB # 160999, DATED. 1/26/16 (7 PAGES);...
- ***SEE FULL LETTER IN FILE.
- 01/23/2017 01/24/2017 47

CARPENTER WILLIAM C JR.

LETTER FROM JUDGE CARPENTER TO COUNSEL

MR. HEYDEN FILED A MOTION FOR SEVERANCE OF CHARGES ON BEHALF OF MR. BRISCO. WHILE THE MOTION WAS FILED AFTER THE MOTION DEADLINE, I AM ASKING THE STATE TO RESPOND SO IT CAN BE RESOLVED PRIOR TO THE TRIAL SET FOR MARCH 6, 2017. THE COURT WOULD LIKE A RESPONSE FROM THE STATE BY FEBRUARY 3, 2017. THANK YOU.

> *** END OF DOCKET LISTING AS OF 02/01/2017 *** PRINTED BY: JDEFSEY

DOB: 11/07/1999 State of Delaware v. RAYMIRE BRISCOE

State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE

Co-Defendants: JACQUEZ ROBINSON , JACQUEZ ROBINSON

Co-Defendants: JOHN BRISCO , KADIR MCCOY Co-Defendants: ALEXANDER FITZGERALD , AQUANTAY GARNER

Co-Defendants: RYLIER GRAYSON , RONALD MADDREY Co-Defendants: RONALD MADDRAY , AQUANTAY GARNER Co-Defendants: JAYMERE WHITE , JOHN BRISCO

Co-Defendants: DAYMERE WISHER , RAYMIRE BRISCOE Co-Defendants: TYMERE RIGHTER , AQUANTAY GARNER

Co-Defendants: KADIR MCCOY , BRYANT HAWKES Co-Defendants: JACQUEZ ROBINSON , RANDY SCOTT

Co-Defendants: RONALD MADDREY , ALEXANDER FITZGERALD

Co-Defendants: DEJUAN ROBINSON , DEJUAN ROBINSON

Assigned Judge: CARPENTER WILLIAM C JR.

Charges:	:				
Count	DUC#	Crim.Action#	Description	Dispo.	Dispo. Date
001	1505024834	IN15060716	PROH FIREARM	NOLP	08/31/2015
002	1505024834	IN15060717	PFDCF	NOLP	08/31/2015
003	1505024834	IN15060718	POS WEAP NO SER	NOLP	08/31/2015
004	1505024834	IN15060719	RECK END 1ST	NOLP	08/31/2015
005	1505024834	IN15061570	PFBPP PABPP	NOLP	08/31/2015
006	1505024834	IN15061571	HNDGUN PROH JUV	NOLP	08/31/2015
007	1505024834	IN15081579	RECK END 1ST	NOLP	11/09/2015
008	1505024834	IN15081580	PFDCF	NOLP	11/09/2015
009	1505024834	IN15081581	PFBPP PABPP	NOLP	11/09/2015
010	1505024834	IN15081582	PFBPP PABPP	NOLP	11/09/2015
011	1505024834	IN15081583	POS WEAP NO SER	NOLP	11/09/2015
012	1505024834	IN15081584	HNDGUN PROH JUV	NOLP	11/09/2015
013	1505024834	IN15081585	RECK END 1ST	NOLP	11/09/2015
014	1505024834	IN15081586	PFDCF	NOLP	11/09/2015
015	1505024834	IN15081587	PROH FIREARM	NOLP	11/09/2015
016	1505024834	IN15081588	PROH FIREARM	NOLP	11/09/2015
017	1505024834	IN15081589	POS WEAP NO SER	NOLP	11/09/2015
018	1505024834	IN15081590	HNDGUN PROH JUV	NOLP	11/09/2015
019	1505024834	I	ASSAULT 1ST	NOLP	11/09/2015
019	1505024834	I	RECK END 1ST	NOLP	11/09/2015
020	1505024834	I	PFDCF	NOLP	11/09/2015
020	1505024834	I	PFDCF	NOLP	11/09/2015
021	1505024834	I	HNDGUN PROH JUV	NOLP	11/09/2015
021	1505024834	I	PFBPP PABPP	NOLP	11/09/2015
022	1505024834	I	MURDER 1ST	NOLP	11/09/2015
022	1505024834	I	PFBPP PABPP	NOLP	11/09/2015
023	1505024834	IN15081595W	PFDCF	NOLP	11/09/2015
024	1505024834	IN15081596W	CONSP 1ST	NOLP	11/09/2015
025	1505024834	IN15081597W	HNDGUN PROH JUV	NOLP	11/09/2015
026	1505024834	IN15081598W	GANG PARTICP.	NOLP	11/09/2015
027	1505024834	IN15110687	ASSAULT 1ST		

028 029 030 031 032 033 034 035 036 037 038 039 040	1505024834 1505024834 1505024834 1505024834 1505024834 1505024834 1505024834 1505024834 1505024834 1505024834	IN15110689 IN15110690 IN15110691 IN15110692 IN15110693 IN15110694 IN15110696 IN15110696	PFDCF CONSP 1ST MURDER 1ST GANG PARTICP. HNDGUN PROH JUV HNDGUN PROH JUV POS WEAP NO SER HNDGUN PROH JUV RECK END 1ST PFDCF PFBPP PABPP	
No.	Event Date Event	Docket Add Date		Judge
27	RE: STATE V. DEAR MR. ROBI IN RESPONSE THE FOLLOWING THE DEFENDANT DISCOVERY PACESTATEMENTS OF	IPEK MEDFORD, DAG RAYMIRE BRISCOE, ERTS: TO YOUR LETTER DAT G. T'S RECORDED STATE CKET DATED 11/5/15 THE FOLLOWING CO	I.D. NOS. 15050248 ED SEPTEMBER 16, 2 MENT WAS PROVIDED ALSO PROVIDED THE	2015 THE STATE PROVIDES
1	06/10/2015 CASE ACCEPTED ARREST DATE: PRELIMINARY F BAIL: CASH F	O IN SUPERIOR COUR 05/30/2015 HEARING DATE: HELD BAIL F BAIL: COOPERATE	T. AT FAMILY COURT O	000.00
2	07/21/2015 MOTION TO DIS BY NATALIE HA SCHED FOR 07/ 07/27/2015 MOTION TO DIS	07/22/2015 EMISS FILED. ASKINS, ESQ '27/15 @1:30 07/27/2015	P.A	ARKER LYNNE M
3	PASSED TO 08/ CASE TO BE IN 08/03/2015 INDICTMENT, T SCHEDULED FOR CASE REVIEW 0 08/05/2015	10/15 @1:30 NDICTED ON 08/03/1 08/05/2015 RUE BILL FILED.NO 08/18/2015 ARRAI 09/21/2015 AT 9:00 08/05/2015	21 GNMENT AT 9:30	
4	CASE INDICTED 08/18/2015	08/18/2015	VA LED_BY NATALIE HAS	AVALA MARK S SKINS, ESQ. AVALA MARK S

State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE
Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE DOB: 11/07/1999 State of Delaware v. RAYMIRE BRISCOE Event Date Docket Add Date Judge Event ______ BAIL REDISTRIBUTED. 86,000.00 CASH BAIL (NONE) 08/18/2015 08/18/2015 5 VAVALA MARK S COMMITMENT TO DEPARTMENT OF CORRECTION. BAIL REDISTRIBUTED. 08/20/2015 08/20/2015 SCHEDULING ORDER ISSUED THE FOLLOWING COURT DATES ARE ESTABLISHED: (A) FIRST CASE REVIEW 09/28/2015 (B) FINAL CASE REVIEW 12/28/2015 (C) TRIAL 01/12/2016 CARPENTER WILLIAM C JR. 08/25/2015 08/25/2015 7 SCHEDULING ORDER ISSUED THE FOLLOWING COURT DATES ARE ESTABLISHED: (A) FIRST CASE REVIEW 09/28/2015 (B) FINAL CASE REVIEW 01/04/2016 (C) TRIAL 01/12/2016 08/31/2015 09/01/2015 8 REINDICTMENT - TRUE BILL FILED.NO 100 08/31/2015 09/02/2015 CASE CONSOLIDATED WITH: 1508021819 RULE 9 WARRANT ISSUED UNDER CASE#1508021819 (CG) RULE 9 WARRANT RETURNED ARREST INFORMATION IS LISTED IN DELJIS. MEMORANDUM FILED, CONSOLIDATION NOTICE FAXED TO CENTRAL RECORD FOR NEW CASTLE COUNTY DETENTION CENTER. 09/03/2015 09/04/2015 10 MEMO SPECIALLY ASSIGNING MURDER CASE. TO: JUDGE CARPENTER THE ABOVE NON-CAPITAL 1ST DEGREE MURDER CASES ARE SPECIALLY ASSIGNED TO YOU FOR ALL PURPOSES UNTIL FINAL DISPOSITION. THE DEFENDANTS WERE INDICTED ON AUGUST 31, 2015. THE HONORABLE JAN R. JURDEN PARKER LYNNE M 09/15/2015 09/15/2015 ARRAIGNMENT CALENDAR - DEFENDANT WAIVED READING; ENTERED PLEA OF NOT GUILTY; JURY TRIAL DEMANDED BY DONALD ROBERTS, ESQ. 09/15/2015 09/15/2015 PARKER LYNNE M BAIL MODIFIED. BAIL NOW SET AT 186,000.00 CASH BAIL

HELD WITHOUT BAIL

(NONE)

0.00

DOB: 11/07/1999 State of Delaware v. RAYMIRE BRISCOE State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE
Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE Event Date Docket Add Date Judge Event _______ 09/15/2015 09/15/2015 PARKER LYNNE M COMMITMENT TO DEPARTMENT OF CORRECTION. ON MURDER 1ST CHARGE, DEFENDANT IS HWOB, BAIL IS SET AT \$186,000.00 CASH ON REMAINING CHARGES. 09/18/2015 09/21/2015 ENTRY OF APPEARANCE FILED BY DONALD ROBERTS, ESQ ON BEHALF OF DEFT RAYMIRE BRISCOE 10/01/2015 CARPENTER WILLIAM C JR. 13 09/18/2015 NOTICE OF SERVICE - DISCOVERY REQUEST. BY DON ROBERTS, ESQ. 14 10/14/2015 10/15/2015 MOTION TO TRANSFER TO FAMILY COURT FILED. (D. ROBERTS, ESQ.) 10/21/2015 10/21/2015 15 EMAIL FILED FROM T. WALLS-PULLING TO COUNSEL RE: OFFICE CONFERNCE SCHEDULED FOR 11/16/2015 AT 1PM. PLEASE MARK YOUR CALENDARS. 18 11/06/2015 11/17/2015 LETTER FROM: IPEK MEDFORD, DAG TO: DONALD ROBERTS, ESQ. LETTER DATED: 11/5/2015. RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16, THE FOLLOWING INFORMATION CONCERNING THE ABOVE CAPTIONED CASE IS BEING SUPPLIED. ENCLOSED PLEASE FIND 1 DISC LABELED "REDACTED POLICE REPORTS" CONTAINING THE FOLLOWING: - WPD COMPLAINT NO. 30-13-008568... - COMPLAINT NO. 30-14-035123... - COMPLAINT NO. 30-14-035149... - COMPLAINT NO. 30-14-059484... *** SEE FULL LETTER IN FILE *** 11/09/2015 11/17/2015 16 REINDICTMENT - TRUE BILL FILED.NO 75 11/12/2015 11/25/2015 20 LETTER FROM: IPEK MEDFORD, DAG, TO: DONALD ROBERTS, ESQ, DATED 11/10/15. RE: IN REGARDS TO THE ABOVE-CAPTIONED MATTERS, ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS: 1. ONE(1) CERTIFIED COPY OF THE JUDGMENT IN A CRIMINAL CASE FOR

FEDERAL CASE NUMBER 13-CR-00114-SLR, DEFENDANT BRYANT HAWKES (6 PAGES); 2. ONE(1) DVD CONTAINING THE MVR OF RONALD MADDRAY'S 04/28/2015 ARREST

BY ELSMERE POLICE DEPARTMENT; AND.....

*** SEE FULL LETTER IN FILE ***

11/12/2015 11/25/2015

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State of Delaware v. RAYMIRE BRISCOE DOB: 11/07/1999

State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE
Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE

Event Date Docket Add Date Judge Event

LETTER FROM: IPEK MEDFORD, DAG, TO: THE HONORABLE WILLIAM CARPENTER,

DATED 11/12/15. RE: IN ANTICIPATION OF THE NOVEMBER 16, 2015 OFFICE CONFERENCE, THE

STATE IS PROPOSING THE FOLLOWING TRIAL GROUPINGS:....

*** SEE FULL LETTER IN FILE ***

11/16/2015 12/02/2015 23 LETTER FROM: IPEK MEDFORD, DAG, TO: DONALD ROBERTS, ESQ, DATED

RE: ENCLOSED PLEASE FIND ONE(1) DISC LABELED "PRISON MAIL 11/12/15" WHICH MAY HAVE BEEN INADVERTENTLY OMITTED FROM THE STATE'S DISCOVERY PACKET PROVIDED TO YOU ON NOVEMBER 5, 2015, AND WHICH WAS IDENTIFIED THEREIN AS "DISC NUMBER 15". THIS DISC IS LABELED "PRISON MAIL" AND CONTAINS REDACTED PRISON MAIL OF THE FOLLOWING DEFENDNATS:..... *** SEE FULL LETTER IN FILE ***

- 11/17/2015 19 11/17/2015
 - CONFERENCE HELD BEFORE JUDGE CARPENTER. CASES ARE TO BE GROUPED AS FOLLOWS: GROUP 1: J. BRISCOE 1502007987, D. WISHER 1508021812, & K. MCCOY 1501018069. GROUP 2: R. BRISCOE 1505024834, J. WHITE 1508015000, & T. RIGHTER 1508021828. GROUP 3: A. FITZGERALD 1503016511, A. GARDNER 1504005092, & R. GRAYSON 1504005579. GROUP 4: R. MADDREY 1504004537, D. ROBINSON 1507017043, & J. ROBINSON 1411005041. GROUP 5: R. SCOTT 1508021944 & B. HAWKES 1508021938. JUDGE CARPENTER IS TO SET DEADLINES FOR MOTION TO SEVER FOR EACH GROUP AND ANY MOTIONS TO OBJECT TO THE GROUPING. ONCE GROUPS ARE FINALIZED, TRIAL DATES AND OTHER DEADLINES ARE TO BE ESTABLISHED.
- CARPENTER WILLIAM C JR. 22 11/30/2015 LETTER FROM JUDGE CARPENTER TO ALL COUNSEL OF RECORD RE: AT OUR CONFERENCE ON 11/16/2015, THE STATE DISCLOSED THE DEFENDANT GROUPINGS IT WOULD LIKE TEH COURT TO CONSIDER IN TRYING THE ABOVE-CAPITIONED MATTERS. THE COURT INDICATED IT WOULD SCHEDULE A DEADLINE FOR OBJECTIONS TO THE INCLUSION OF A PARTICULAR DEFENDANT IN A GROUPING AND THAT THE DEADLINE WOULD BE 12/18/2015. IF YOU HAVE NOT FILED AN OBJECTION BY THAT DATE, THE COURT WILL ASSUME YOU ARE SATISFIED WITH THE STATES PROPOSED GROUPING OF YOUR DEFENDANT. OBVIOUSLY IF YOU OBJECT, PLEASE ARTICULATE THE REASON WHY AND BE PRECISE AS POSSIBLE, RECOGNIZING THAT DISCOVERY HAS ONLY RECENTLY BEEN PROVIDED. ONCE THE GROUPINGS ARE ESTABLISHED, THE COURT WILL BEGIN THE PROCESS OF ASSIGNING TRIAL DATES.
- 25 12/15/2015 12/29/2015 EMAIL FILED TO: P. DOKO, AG AND D. ROBERTS, ESQ. RE: A REVERSE AMENABILITY HEARING IN SCHEDULED ON RAYMIRE BRISCOE ON APRIL 11, 2016 AT 9:00 WITH

State of Delaware v. RAYMIRE BRISCOE

DOB: 11/07/1999

State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE

Event Date Docket Add Date

Judge

Event

24

JUDGE MEDINILLA

12/16/2015 12/22/2015

LETTER FROM: IPEK MEDFORD, DAG TO: DONALD ROBERTS, ESQ.

LETTER DATED: 12/16/2015.

RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16(A)(1)(E), ENCLOSED PLEASE FIND 1 COPY OF EACH OF THE BELOW LISTED SUPPLEMENTAL ITEMS PREPARED IN CONNECTION WITH THE ABOVE REFERENCED CASE BY RJ LEE GROUP: 1. 1 REDACTED COPY OF THE RJ LEE GUNSHOT RESIDUE ANALYSIS RELATED TO COMPLAINT NO. 30-15-7520...

2. 1 COPY OF THE RJ LEE GUNSHOT RESIDUE ANALYSIS RELATED TO COMPLAINT NO. 30-15-38102...

*** SEE FULL LETTER IN FILE ***

12/29/2015 12/31/2015 26

CARPENTER WILLIAM C JR.

LETTER TO COUNSEL FROM JUDGE CARPENTER ON 11/24/2015, THE COURT SET A DEADLINE OF 12/18 FOR COUNSEL TO RESPOND AS TO WHETHER THERE WERE ANY OBJECTIONS TO THE GROUPINGS THAT THE STATE HAD PROPOSED IN ITS LETTER OF 11/12/2015. IN RESPONSE TO THE LETTER, THE COURT RECEVIED LETTERS FROM BRIAN JORDAN, ESQ ON BEHALF OF BRYANT HAWKES AND DANA REYNOLDS, ESQUIRE ON BEHALF OF RANDY SCOTT INDICATING THEIR OBJECTIONS TO THE GROUPINGS THAT HAVE BEEN MADE. WHILE NEITHER FILED FORMAL MOTIONS TO SEVER, THEIR LETTERS WOULD APPEAR TO INDICATE THEY WILL BE ASKING FOR SEVERANCE OF THEIR CLIENTS CASES FROM THE LARGER INDICTMENT. THE COURT HAS RECEIVED MOTIONS TO SEVER FROM ROBERT VRANA, ESQ ON BEHALF OF RONALD MADDREY, PETER VEITH, ESQUIRE ON BEHALF OF AQUANTAY GARDENER AND GERALD HAGER, ESQ ON BEHALF OF JAYMERE WHITE, ALL REQUESTING SEVERANCE OF THEIR CLIENTS CASES FROM THE GROUPING AND TO ALLOW THEIR CASES TO BE TRIED SEPARATELY.

SINCE THE COURT'S PREVIOUS LETTER ONLY REQUESTED AN INDICATION WHETHER COUNSEL OBJECTED TO THE PARTICULAR GROUPINGS, IT DID NOT SET A DEADLINE FOR AN ACTUAL SEVERANCE MOTION. IN ORDER FOR US TO HANDLE ALL OF THE POTENTIAL SEVERANCE ISSUES AT ONCE, THE COURT IS SETTING A DEADLINE OF 1/15/2016 FOR THE FILING OF ANY ADDITIONAL MOTIONS TO SEVER. IF NO NEW MOTIONS ARE FILED BY THAT DEADLINE, THE COURT WILL ASSUME THAT THOSE DEFTS ARE NOT OBJECTING TO THE GROUPING IN WHICH THEY HAVE BEEN PLACED AND THERE IS NO GOOD-FAITH BASIS TO REQUEST A SEVERANCE FROM THE OTHER DEFTS IN THEIR GROUPS. THE STATE WILL HAVE UNTIL FEB 5, 2016 TO RESPOND TO ALL MOTIONS THAT HAVE BEEN FILED AS WELL AS ALL LETTER CORRESPONDENCE OBJECTING TO THE GROUPINGS.ONCE THE PENDING MOTIONS ARE RESOLVED, THE ACTUAL TRIAL DATE FOR THOSE THAT REMAIN IN THE GROUPS WILL BE ESTABLISHED.

JUDGE CARPENTER

State of Delaware v. RAYMIRE BRISCOE

DOB: 11/07/1999

State of Delawate V. RAIMIRE BRISCOE

State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE

Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE

Event

Event Date Docket Add Date

Judge

04/06/2016 04/07/2016 STATE'S RESPONSE TO DEFT'S MOTION FOR REVERSE AMENABILTY FILED BY: IPEK MEDFORD, JOHN DOWNS, ESQ AND PERIANN DOKO, ESQ REFERRED TO JUDGE MEDINILLA ON 4/7/2016

04/29/2016 05/04/2016

MOTION TO TRANSFER TO FAMILY COURT WITHDRAWN.

07/11/2016 07/11/2016 30

STATE'S MOTION TO TRANSFER DETENTION OF DEFENDANT CHARGED OF SUPERIOR COURT OFFENSES FILED.

BY PERIANN DOKO, DAG; JOHN DOWNS, DAG; AND IPEK MEDFORD, DAG REFERRED TO JUDGE CARPENTER ON 07/11/16

MEDINILLA VIVIAN L 07/12/2016 07/12/2016 31 STATE'S MOTION TO TRANSFER DETENTION OF DEFENDANT GRANTED. AND NOW, TO WIT, THIS 12TH DAY OF JULY, 2016, THAT THE STATE'S MOTION TO TRANSFER DETENTION OF DEFENDANT HAVING BEEN HEARD AND CONSIDERED, IT IS HEREBY ORDERED THAT, PURSUANT TO 11 DEL.C. SECTION 2103A, THE DEFENDANT HAS BEEN FOUND NON-AMENABLE AND SHOULD BE TRANSFERRED FROM THE NEW CASTLE COUNTY DETENTION CENTER TO THE DEPARTMENT OF CORRECTION IT IS SO ORDERED.

THE HONORABLE VIVIAN L. MEDINILLA

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07/26/2016 08/02/2016

LETTER FROM: IPEK MEDFORD, DAG TO: ALEXANDER FUNK, ESQ. LETTER DATED: 7/26/2016.

RE: DUE TO THE VOLUMINOUS AMOUNT OF DISCOVERY ITEMS TO BE PROVIDED IN THE ABOVE-CAPTIONED CASE, THE STATE IS PROVIDING THE BELOW LISTED DOCUMENTS TO YOU VIA DROPBOX:

IN REGARDS TO WILMINGTON POLICE DEPARTMENT COMPLAINT 30-13-008568:

- 1. CRIME SCENE VIDEO (CONTAINING 1 FILE);
- 2. CRIME SCENE PHOTOGRAPHS (141 TOTAL);
- 3. CRIME SCENE SKETCH (1 PAGE);...
- *** SEE FULL LETTER IN FILE ***

08/03/2016 08/03/2016 33

CARPENTER WILLIAM C JR.

LETTER FROM JUDGE CARPENTER TO COUNSEL I HAVE RECENTLY REVIEWED THE TRANSCRIPTS OF THE HEARING HELD BACK IN MAY AND HAVE CONSIDERED THE VARIOUS MOTIONS TO SEVER WHICH HAVE BEEN FILED. AS A RESULT OF THIS REVIEW, THE COURT BELIEVES THE REAL ISSUE HERE IS NOT WHETHER DEFENDANTS WILL BE SEVERED OUT TO BE TRIED SEPARATELY BUT RATHER, WHICH WHOM EACH SHOULD BE GROUPED FOR TRIAL... IF A DEFENDANT IN GROUP TWO OR THREE HAS FILED A MOTION TO SEVER, THAT MOTION IS DENIED AT THIS TIME....FOR THE REASONS NOTED ABOVE, MR. HAWKES'S MOTION TO SEVER IS DENIED.

SEE FULL LETTER IN FILE

State of Delaware v. RAYMIRE BRISCOE

DOB: 11/07/1999

State of Delaware V. RAYMIRE BRISCOE

State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE

Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE

Event Date Docket Add Date

Judge

Event

08/04/2016 08/05/2016

LETTER FROM: IPEK MEDFORD, DAG TO: ALEXANDER FUNK, ESQ.

LETTER DATED: 8/4/2016.

RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16 (A)(1)(E), ENCLOSED PLEASE FIND ONE DISC CONTAINING ONE COPY OF EACH OF THE BELOW LISTED SUPPLEMENTAL ITEMS PREPARED IN CONNECTION WITH THE ABOVE REFERENCED CASE:

- 1. THE FORENSIC CASE REPORT FOR BODE CELLMARK CASE #: CCC1547-0432, DATED DECEMBER 18, 2015, PREPARED BY CHRISTINA NASH, MSFS, DNA ANALYST I, OF BODE CELLMARK FORENSICS (7 PAGES)...
- *** SEE FULL LETTER IN FILE ***

08/10/2016 08/10/2016 35

EMAIL FILED TO COUNSEL FROM T. WALLS-PULLING

REGARDING THE TRIAL SCHEDULED TO BEGIN ON 10/11/16, THERE ARE A FEW DAYS IN OCTOBER AND NOVEMBER WHEN THE TRIAL WILL NOT BE HELD OR WILL END EARLY. JUDGE CARPENTER WANTED YOU TO BE AWARE OF THEM SO YOU MAY PLAN ACCORDINGLY. HERE ARE THE DATES:

10/14/16 - NO TRIAL

10/26 & 10/27 - JUDICIAL RETREAT BEING HELD

11/3/16 - TRIAL WILL END EARLY FOR MANDATORY JUDGES MEETING IN KENT COUNTY SCHEDULED FOR 3 PM

THANK YOU

08/11/2016 08/12/2016 36

LETTER FROM: IPEK MEDFORD, DAG TO: ALEXANDER FUNK, ESQ.

LETTER DATED: 8/10/2016.

RE: ENCLOSED PLEASE FIND ONE DISC CONTAINING THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

- 1. ONE COPY OF THE FORENSIC FIREARMS REPORT RELATED TO COMPLAINT 33-14-005650, PREPARED BY CARL RONE, FIREARMS AND TOOL MARK EXAMINER, OF THE DELAWARE STATE POLICE FORENSIC FIREARMS UNIT, DATED NOVEMBER 11, 2015 (28 PAGES)...
- *** SEE FULL LETTER IN FILE **

38

08/19/2016 08/30/2016

LETTER FROM: IPEK K. MEDFORD, DAG. TO: ALEXANDER FUNK, ESQ.

RE: STATE V. RAYMIRE BRISCOE, I.D.NOS. 1505024834.

MR. FUNK:

ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

1. ONE (1) DISC CONTAINING THE OFFICE OF THE CHIEF MEDICAL EXAMINER'S ENTIRE LITIGATION PACKET FOR DNA15-48 LITIGATION PACKET;

****SEE FILE FOR FULL LETTER****

37

08/23/2016 08/24/2016

LETTER FROM: IPEK MEDFORD, DAG TO: ALEXANDER FUNK, ESQ

State of Delaware v. RAYMIRE BRISCOE

DOB: 11/07/1999

State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE
Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE

Event Date Docket Add Date

Judge

Event _______

RE: LETTER DATED 8/23/16.

DUE TO THE AMOUNT OF CELL PHONE EXTRACTIONS AND FILES IN THE ABOVE-CAPTIONED CASE, THE STATE IS PROVIDING THE BELOW LISTED FOLDERS AND THE EXTRACTIONS TO YOU VIA DROPBOX:

- 1. "BRISCO, JOHN HTC PHONE DUMP" CONTAINING 1,894 IMAGES AND ONE EXTRACTION REPORT (277 PAGES);
- 2. "BRISCO, RAYMIRE" CONTAINING THE CELL PHONE EXTRACTION OF ONE(1) APPLE IPHONE 5C, SERIAL NUMBER: FCCNR1DEG07M, ALSO INCLUDING BUT... ***SEE FULL LETTER IN FILE***
- 08/24/2016 09/07/2016 40

ORDER: PROTECTIVE ORDER IS NECESSARY TO BALANCE THE STATE'S INTERESTS IN SAFEGUARDING THE IDENTITY OF ITS CIVILIAN WITNESSES WITH THE NEED TO PERMIT DEFTS' COUNSEL TO PREPARE EFFICIENTLY FOR TRIAL AND TO FURTHER ENCOURAGE THE EXCHANGE OF INFORMATION BETWEEN THE PARTIES THAT WOULD OTHERWISE NOT BE DISCOVERABLE PURSUANT TO S.C. CRIM RULE 16, (SEE FULL ORDER)

IT IS SO ORDERED BY JUDGE CARPENTER

09/02/2016 09/02/2016 39

LETTER FROM A. FUNK TO JUDGE CARPENTER

RE: RESPECTFULLY REPRESENT TO THE COURT THAT, UNDER THE CIRCUMSTANCES, I DO NOT BELIEVE THAT WE CAN BE READY TO PROCEED TO TRIAL, AND TO PROVIDE A CONSTITUTIONALLY ADEQUATE DEFENSE FOR MR. BRISCOE, BY 10/11. (SEE FULL LETTER)

41 09/02/2016 09/08/2016

LETTER FROM: IPEK MEDFORD, DAG TO: ALEXANDER FUNK, ESQ.

LETTER DATED: 9/2/2016.

RE: THE BELOW LISTED REDACTED TRANSCRIPTS ARE AVAILABLE VIA THE FOLLOWING DROPBOX LINK:

HTTPS://WWW.DROPBOX.COM...

- 1. WITNESS A, DATED 12/02/2014 (12 PAGES);
- 2. WITNESS B, DATED 02/27/2013 (5 PAGES);
- 3. WITNESS C, DATED 02/27/2013 (9 PAGES);
- 4. WITNESS D, DATED 01/26/2015 (7 PAGES)...
- *** SEE FULL LETTER IN FILE ***
- 42

09/08/2016 09/13/2016

LETTER FROM: ALEXANDER W. FUNK, ESQ.

TO: THE HONORABLE WILLIAM C. CARPENTER, JR.

RE: STATE V. RAYMIRE BRISCOE, I.D. NO. 1505024834.

LETTER DATED: SEPTEMBER 2, 2016.

DEAR JUDGE CARPENTER:

AS YOUR HONOR IS AWARE, THOMAS DONOVAN, ESQUIRE, AND I WERE CONFIRMED AS SUBSTITUTE COUNSEL FOR RAYMIRE BRISCOE IN THE ABOVE-MATTERS ON JUNE

State of Delaware v. RAYMIRE BRISCOE

DOB: 11/07/1999

State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE

No.

Event Date Docket Add Date

Judge

Event

****SEE FILE FOR FULL LETTER****

43

09/14/2016 09/14/2016 OFFICE CONFERENCE PROCEEDING HELD BEFORE JUDGE CARPENTER AND COUNSEL DEFT TO BE EVALUATED BY MENTAL HEALTH EXPERT NEW TRIAL DATE 3/6/17, 4 WEEKS TRANSCRIPT SEALED

09/19/2016 44

09/22/2016

LETTER FROM: IPEK MEDFORD, DAG TO: ALEXANDER FUNK, ESQ

RE: LETTER DATED 9/16/16.

THE HEREIN PROVIDED DROPBOX LINK CONTAINS THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

1. THE LITIGATION PACKET FOR BODE CELLMARK FORENSICS' TESTING IN BODE CASE #CCC1547-0432, THE TESTED EVIDENCE RELATES TO WILMINGTON POLICE DEPARTMENT'S COMPLAINT NUMBERS: 30-15-003782, 30-14-035149,

30-15-005259, AND 30-15-56288. THE PROVIDED LITIGATION PACKET INCLUDES THE FOLLOWING DOCUMENTS...

SEE FULL LETTER IN FILE

45 09/26/2016 09/26/2016

CARPENTER WILLIAM C JR.

LETTER FROM: JUDGE CARPENTER TO: ALL COUNSEL OF RECORD

RE: LETTER DATED 09/23/16

ON SEPTEMBER 14, 2016, THE COURT HELD A CONFERENCE WITH COUNSEL FOR THE DEFENDANTS INITIALLY SCHEDULED TO BE IN THE FIRST TRIAL GROUPING SET FOR OCTOBER 11, 2016. BASED UPON THE INFORMATION PROVIDED TO THE COURT AT THAT CONFERENCE, THE TRIAL OF THE FIRST GROUP HAS BEEN POSTPONED TO MARCH 6, 2017....

SEE FULL LETTER IN FILE

46

10/03/2016 10/06/2016

LETTER FROM: IPEK MEDFORD, DAG TO: ALEXANDER FUNK, ESQ

RE: LETTER DATED 10/3/16.

ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

- 1. ONE(1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S LABORATORY REPORT NUMBER: 2015-01288-6, DATED SEPTEMBER 22, 2016 (13 PAGES);
- 2. ONE (1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S LEAD REPORT FOR CASE ID NUMBER 281D-BA-6122070 (18 PAGES);
- 3. ONE(1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S EVIDENCE DATA-LOADING FORM FOR CASE ID NUMBER 281D-BA-6122070 (6 PAGES)...

SEE FULL LETTER IN FILE

47

01/17/2017 01/23/2017

LETTER FROM: JOHN W. DOWNS, DAG TO: ALEXANDER FUNK

LETTER DATED: 01/13/2017

RE: ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

DOB: 11/07/1999

Page 11

State of Delaware v. RAYMIRE BRISCOE State's Atty: PERIANN DOKO , Esq. AKA: RAYMIRE J BRISCOE
Defense Atty: THOMAS D DONOVAN , Esq. RAYMIRE J BRISCOE

Event Date Docket Add Date

Judge

Event

No.

1. ONE(1) CD CONTAINING THE 3/24/15 RECORDED STATEMENT OF CO-DEFENDANT ALEXANDER FIZGERALD; AND

2. ONE(1) CD CONTAINING THE FOLLOWING SUPPLEMENTAL FORENSIC FIREARMS REPORTS:

2A. ONE(1) COPY OF THE FORENSIC FIREARMS REPORT LAB # 160999, DATED 1/26/16 (7 PAGES);...

***SEE FULL LETTER IN FILE.

*** END OF DOCKET LISTING AS OF 02/01/2017 *** PRINTED BY: JDEFSEY

State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

Co-Defendants: JACQUEZ ROBINSON , JACQUEZ ROBINSON

Co-Defendants: JOHN BRISCO , KADIR MCCOY

Co-Defendants: AQUANTAY GARNER , RYLIER GRAYSON Co-Defendants: RONALD MADDREY , RONALD MADDRAY Co-Defendants: AQUANTAY GARNER, RAYMIRE BRISCOE Co-Defendants: JAYMERE WHITE , JOHN BRISCO

Co-Defendants: DAYMERE WISHER , RAYMIRE BRISCOE Co-Defendants: TYMERE RIGHTER , AQUANTAY GARNER Co-Defendants: KADIR MCCOY , BRYANT HAWKES

Co-Defendants: JACQUEZ ROBINSON , RANDY SCOTT

Co-Defendants: RONALD MADDREY , ALEXANDER FITZGERALD

Co-Defendants: DEJUAN ROBINSON , DEJUAN ROBINSON

Assigned Judge: CARPENTER WILLIAM C JR.

Charge	es:				
Count	DUC#	Crim.Action#	Description	Dispo.	Dispo. Date
001	1503016511	IN15040937	CCDW	NOLP	08/31/2015
002	1503016511	IN15040938	RESIST ARREST	NOLP	08/31/2015
003	1503016511	IN15081599	CCDW	NOLP	11/09/2015
004	1503016511	IN15081600	RESIST ARREST	NOLP	11/09/2015
005	1503016511	IN15081601	CCDW	NOLP	11/09/2015
006	1503016511	IN15081602	RESIST ARREST	NOLP	11/09/2015
007	1503016511	IN15081720W	GANG PARTICP.	NOLP	11/09/2015
008	1503016511	IN15081721W	MURDER 1ST	NOLP	11/09/2015
009	1503016511	IN15081722W	PFDCF	NOLP	11/09/2015
010	1503016511	IN15081723W	HNDGUN PROH JUV	NOLP	11/09/2015
011	1503016511	IN15110697	GANG PARTICIPAT		
012	1503016511	IN15110698	MURDER 1ST		
013	1503016511	IN15110699	PFDCF		
014	1503016511	IN15110854	CCDW		
015	1503016511	IN15110855	RESIST ARREST		
No.	Event Date Event	Docket Add Date		Judge	

04/17/2015 04/17/2015

CASE ACCEPTED IN SUPERIOR COURT.

ARREST DATE: 03/25/2015

PRELIMINARY HEARING DATE: 041515

BAIL: CASH BAIL

CONDITION OF BAIL: NO CONTACT WITH VICTIMS DIRECT OR INDIRECT

6,000.00

MAKE NO ATTEMPTS TO LOCATE THE ALLEGED VICTIM

DOB: 07/21/1996 State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

Judge Event Date Docket Add Date No. Event

ALL TIMES STAY 100 OR MORE YARDS AWAY FROM THE ALLEGED VICTIM PRE-TRIAL SUPERVISION -GPS MONITOR , ZERO TOLERANCE WEAPONS,

CURFEW 7PM -6AM, VERFIY ADDRESS

05/22/2015 05/22/2015

2

MOTION TO DISMISS FILED.

BY BETH SAVITZ, ESQ

SCHED FOR 06/01/15 @1:30

VAVALA MARK S 06/01/2015 06/01/2015

MOTION TO DISMISS PASSED. PASSED TO 06/29/15 @1:30

CASE TO BE INDICTED ON 06/22/15

06/29/2015 06/22/2015 3

INDICTMENT, TRUE BILL FILED.NO 17

SCHEDULED FOR CASE REVIEW AND ARRAIGNMENT 08/10/2015 AT 9:00

06/23/2015 06/23/2015

MOTION TO DISMISS RULED AS MOOT.

CASE INDICTED ON 06/22/15

07/20/2015 07/20/2015 4

SCHEDULING ORDER ISSUED

THE FOLLOWING COURT DATES ARE ESTABLISHED:

- (A) FIRST CASE REVIEW 08/03/2015
- (B) FINAL CASE REVIEW 10/26/2015
- (C) TRIAL 11/10/2015
- 07/22/2015 07/22/2015 5

SUMMONS MAILED FOR 8/3/2015 CASE REVIEW.

07/23/2015 07/30/2015 6

LETTER FROM: JOHN DOWNS, DAG TO: BETH SAVITZ, ESQ, DATED 7/23/2015. RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16, THE FOLLOWING INFORMATION CONCERNING THE ABOVE CAPTIONED CASE IS BEING SUPPLIED. COMPLAINT NO. 30-15-020922:

- INITIAL POLICE REPORT OF DET. ROSAIO, DATED 3/23/2015, 5 PAGES;
- SUPPLEMENTAL POLICE REPORT OF CPL/3 LAW, DATED 3/26/2015, 1 PAGE;
- SUPPLEMENTAL POLICE REPORT OF DET. ROSAIO, DATED 3/31/2015, 1 PAGE;
- SUPPLEMENTAL POLICE REPORT OF CPL. SCHUPP, DATED 4/24/2015, 1 PAGE;
- SUPPLEMENTAL POLICE REPORT OF CPL/3 LAW, DATED 5/29/2015, 1 PAGE...

*** SEE FULL LETTER IN FILE ***

08/03/2015 08/03/2015

CASE REVIEW CALENDAR - 10-C FILED BY BETH SAVITZ.

CASE REVIEW & ARRAIGNMENT CALENDAR: SET FOR FINAL CASE REVIEW.

DATE: 10/26/15.

09/01/2015 08/31/2015

State of Delaware v. ALEXANDER FITZGERALD DOB: 07/21/1996

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

Event Date Docket Add Date Event

REINDICTMENT - TRUE BILL FILED.NO 100

SCHEDULED FOR ARRAIGNMENT 09/15/2015 AT 9:30

08/31/2015 09/02/2015

CASE CONSOLIDATED WITH: 1508021873

RULE 9 WARRANT ISSUED UNDER CASE#1508021873 (CG)

09/02/2015 09/02/2015

MEMORANDUM FILED, CONSOLIDATION NOTICE FAXED TO CENTRAL RECORD FOR

09/03/2015 09/04/2015 10

MEMO SPECIALLY ASSIGNING MURDER CASE.

TO: JUDGE CARPENTER

THE ABOVE NON-CAPITAL 1ST DEGREE MURDER CASES ARE SPECIALLY ASSIGNED TO YOU FOR ALL PURPOSES UNTIL FINAL DISPOSITION. THE DEFENDANTS WERE INDICTED ON AUGUST 31, 2015.

THE HONORABLE JAN R. JURDEN

09/09/2015 09/15/2015 11

PORTANTE CHRISTOPHER R

0.00 100%

RULE 9 WARRANT RETURNED, BAIL SET AT

400,000.00 100% CASH BAIL

HELD WITHOUT BAIL

CASE REVIEW 10/19/15 @9:00

09/15/2015 09/15/2015 PARKER LYNNE M

ARRAIGNMENT CALENDAR - DEFENDANT WAIVED READING; ENTERED PLEA OF NOT GUILTY; JURY TRIAL DEMANDED BY CHRISTOPHER KOYSTE, ESQ.

PARKER LYNNE M 09/15/2015 09/15/2015

BAIL MODIFIED. BAIL NOW SET AT

CASH BAIL

150,000.00 100% 0.00 100% HELD WITHOUT BAIL

(NONE)

09/15/2015 09/15/2015 PARKER LYNNE M 12 COMMITMENT TO DEPARTMENT OF CORRECTION. HWOB ON MURDER 1ST CHARGE.

\$150,000.00 CASH BAIL ON REMAING CHARGES.

10/21/2015 10/21/2015 13

EMAIL FILED FROM T. WALLS-PULLING TO COUNSEL

RE: OFFICE CONFERNCE SCHEDULED FOR 11/16/2015 AT 1PM. PLEASE MARK YOUR CALENDARS.

11/06/2015 11/17/2015

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 11/5/2015.

RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16, THE FOLLOWING INFORMATION CONCERNING THE ABOVE CAPTIONED CASE IS BEING SUPPLIED. ENCLOSED PLEASE FIND 1 DISC LABELED "REDACTED POLICE REPORTS"

CONTAINING THE FOLLOWING:

State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

No. Event Date Docket Add Date

Judge

Event

- WPD COMPLAINT NO. 30-13-008568...
- COMPLAINT NO. 30-14-035123...
- COMPLAINT NO. 30-14-035149...
- COMPLAINT NO. 30-14-059484...
- *** SEE FULL LETTER IN FILE ***
- 11/09/2015 11/17/2015 14

REINDICTMENT - TRUE BILL FILED.NO 75

11/12/2015 11/25/2015 17

LETTER FROM: IPEK MEDFORD, DAG, TO: THE HONORABLE WILLIAM CARPENTER, DATED 11/12/15.

RE: IN ANTICIPATION OF THE NOVEMBER 16, 2015 OFFICE CONFERENCE, THE STATE IS PROPOSING THE FOLLOWING TRIAL GROUPINGS:.....

*** SEE FULL LETTER IN FILE ***

11/12/2015 12/09/2015 20

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 11/10/2015.

RE: IN REGARDS TO THE ABOVE CAPTIONED MATTER, ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

- 1. 1 CERTIFIED COPY OF THE JUDGMENT IN A CRIMINAL CASE FOR FEDERAL CASE NUMBER 13-CR-00114-SLR, DEFENDANT BRYANT HAWKES (6 PAGES);
- 2. 1 DVD CONTAINING THE MVR OF RONALD MADDRAY'S 4/28/15 ARREST BY ELSMERE POLICE DEPARTMENT; AND,
- 3. 1 CD CONTAINING PHONE CONVERSATIONS BETWEEN RONALD MADDRAY AND... *** SEE FULL LETTER IN FILE
- 21 11/12/2015

12/09/2015

LETTER FROM: IPEK MEDOFRD, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 11/12/2015.

RE: ENCLOSED PLEASE FIND 1 ADDITIONAL COPY OF THE SECOND DISC CONTAINING THE RECORDED STATMENT OF JAYMERE WHITE, LABELED "WHITE STM. #2 OF 2 - 08.20.2015". ALSO ENCLOSED, PLEASE FIND 1 DISC LABELED " PRISON MAIL 11/12/15" WHICH WAS THE INADVERTENTLY OMITTED DISC NUMBER 15 FROM THE STATE'S DISCOVERY PACKET PROVIDED TO YOU ON NOVEMBER 5, 2015...

*** SEE FULL LETTER IN FILE ***

16 11/16/2015 11/17/2015 CARPENTER WILLIAM C JR.

CONFERENCE HELD BEFORE JUDGE CARPENTER.

CASES ARE TO BE GROUPED AS FOLLOWS: GROUP 1: J. BRISCOE 1502007987, D. WISHER 1508021812, & K. MCCOY 1501018069. GROUP 2: R. BRISCOE 1505024834, J. WHITE 1508015000, & T. RIGHTER 1508021828. GROUP 3: A. FITZGERALD 1503016511, A. GARDNER 1504005092, & R. GRAYSON 1504005579. GROUP 4: R. MADDREY 1504004537, D. ROBINSON 1507017043, & J. ROBINSON 1411005041. GROUP 5: R. SCOTT 1508021944 & B. HAWKES 1508021938. JUDGE

State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

No. Event

Event Date Docket Add Date

Judge

CARPENTER IS TO SET DEADLINES FOR MOTION TO SEVER FOR EACH GROUP AND ANY MOTIONS TO OBJECT TO THE GROUPING. ONCE GROUPS ARE FINALIZED, TRIAL DATES AND OTHER DEADLINES ARE TO BE ESTABLISHED.

11/16/2015 12/08/2015 19

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ. LETTER DATED: 11/13/2015.

RE: IN REGARDS TO THE ABOVE-CAPTIONED MATTER, ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

- 1. 1 DISC LABELED "DOC W.S.S AND MEMEX RPTS." CONTAINING THE FOLLOWING...
- 2. 1 DISC LABELED "AUTOPSIES #1 OF 3" WHICH CONTAINS THE FOLLOWING:
- A. 1 COPY OF THE COMPLETE OFFICE OF THE CHEIF MEDICAL EXAMINER'S FILE REGARDING THE AUTOPSY OF DEWAYNE BROWN...
- *** SEE FULL LETTER IN FILE ***
- CARPENTER WILLIAM C JR. 11/25/2015 11/30/2015 18 LETTER FROM JUDGE CARPENTER TO ALL COUNSEL OF RECORD

RE: AT OUR CONFERENCE ON 11/16/2015, THE STATE DISCLOSED THE DEFENDANT GROUPINGS IT WOULD LIKE TEH COURT TO CONSIDER IN TRYING THE ABOVE-CAPITIONED MATTERS. THE COURT INDICATED IT WOULD SCHEDULE A DEADLINE FOR OBJECTIONS TO THE INCLUSION OF A PARTICULAR DEFENDANT IN A GROUPING AND THAT THE DEADLINE WOULD BE 12/18/2015. IF YOU HAVE NOT FILED AN OBJECTION BY THAT DATE, THE COURT WILL ASSUME YOU ARE SATISFIED WITH THE STATES PROPOSED GROUPING OF YOUR DEFENDANT. OBVIOUSLY IF YOU OBJECT, PLEASE ARTICULATE THE REASON WHY AND BE PRECISE AS POSSIBLE, RECOGNIZING THAT DISCOVERY HAS ONLY RECENTLY BEEN PROVIDED. ONCE THE GROUPINGS ARE ESTABLISHED, THE COURT WILL BEGIN THE PROCESS OF ASSIGNING TRIAL DATES.

22

12/16/2015 12/22/2015

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 12/16/2015.

RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16(A)(1)(E), ENCLOSED PLEASE FIND 1 COPY OF EACH OF THE BELOW LISTED SUPPLEMENTAL ITEMS PREPARED IN CONNECTION WITH THE ABOVE REFERENCED CASE BY RJ LEE GROUP: 1. 1 REDACTED COPY OF THE RJ LEE GUNSHOT RESIDUE ANALYSIS RELATED TO COMPLAINT NO. 30-15-7520...

- 2. 1 COPY OF THE RJ LEE GUNSHOT RESIDUE ANALYSIS RELATED TO COMPLAINT NO. 30-15-38102...
- *** SEE FULL LETTER IN FILE ***
- 12/18/2015 25

02/05/2016

LETTER FROM: CHRISTOPHER KOYSTE, ESQ TO: JUDGE CARPENTER RE: LETTER DATED 12/18/15.

BASED ON THE LIMITED DISCOVERY THAT I HAVE RECEIVED TO DATE, I DO NOT

SUPERIOR COURT CRIMINAL DOCKET (as of 02/01/2017)

State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

No.

Event Date Docket Add Date

Judge

Event ________

OBJECT TO THE PROPOSED GROUPINGS BY THE ATTORNEY GENERAL'S OFFICE. ***SEE FULL LETTER ON FILE***

12/29/2015 12/31/2015

CARPENTER WILLIAM C JR.

LETTER TO COUNSEL FROM JUDGE CARPENTER ON 11/24/2015, THE COURT SET A DEADLINE OF 12/18 FOR COUNSEL TO RESPOND AS TO WHETHER THERE WERE ANY OBJECTIONS TO THE GROUPINGS THAT THE STATE HAD PROPOSED IN ITS LETTER OF 11/12/2015. IN RESPONSE TO THE LETTER, THE COURT RECEVIED LETTERS FROM BRIAN JORDAN, ESQ ON BEHALF OF BRYANT HAWKES AND DANA REYNOLDS, ESQUIRE ON BEHALF OF RANDY SCOTT INDICATING THEIR OBJECTIONS TO THE GROUPINGS THAT HAVE BEEN MADE. WHILE NEITHER FILED FORMAL MOTIONS TO SEVER, THEIR LETTERS WOULD APPEAR TO INDICATE THEY WILL BE ASKING FOR SEVERANCE OF THEIR CLIENTS CASES FROM THE LARGER INDICTMENT. THE COURT HAS RECEIVED MOTIONS TO SEVER FROM ROBERT VRANA, ESQ ON BEHALF OF RONALD MADDREY, PETER VEITH, ESOUIRE ON BEHALF OF AQUANTAY GARDENER AND GERALD HAGER, ESQ ON BEHALF OF JAYMERE WHITE, ALL REQUESTING SEVERANCE OF THEIR CLIENTS CASES FROM THE GROUPING AND TO ALLOW THEIR CASES TO BE TRIED SEPARATELY.

SINCE THE COURT'S PREVIOUS LETTER ONLY REQUESTED AN INDICATION WHETHER COUNSEL OBJECTED TO THE PARTICULAR GROUPINGS, IT DID NOT SET A DEADLINE FOR AN ACTUAL SEVERANCE MOTION. IN ORDER FOR US TO HANDLE ALL OF THE POTENTIAL SEVERANCE ISSUES AT ONCE, THE COURT IS SETTING A DEADLINE OF 1/15/2016 FOR THE FILING OF ANY ADDITIONAL MOTIONS TO SEVER. IF NO NEW MOTIONS ARE FILED BY THAT DEADLINE, THE COURT WILL ASSUME THAT THOSE DEFTS ARE NOT OBJECTING TO THE GROUPING IN WHICH THEY HAVE BEEN PLACED AND THERE IS NO GOOD-FAITH BASIS TO REQUEST A SEVERANCE FROM THE OTHER DEFTS IN THEIR GROUPS. THE STATE WILL HAVE UNTIL FEB 5, 2016 TO RESPOND TO ALL MOTIONS THAT HAVE BEEN FILED AS WELL AS ALL LETTER CORRESPONDENCE OBJECTING TO THE GROUPINGS.ONCE THE PENDING MOTIONS ARE RESOLVED, THE ACTUAL TRIAL DATE FOR THOSE THAT REMAIN IN THE GROUPS WILL BE ESTABLISHED.

JUDGE CARPENTER

24 01/15/2016 01/19/2016 MOTION TO SEVER CO-DEFENDANT'S FILED. BY CHRISTOPHER KOYSTE, ESQ REFERRED TO JUDGE CARPENTER ON 01/20/16

02/05/2016 02/10/2016 26

STATE'S RESPONSE TO DEFENDANT'S MOTION TO SEVER. REFERRED TO JUDG CARPENTER

27 02/09/2016 02/11/2016

LETTER FROM: IPEL K. MEDFORD, DAG. TO: MR. PETER VEITH, ESQ.

RE: STATE V. AOUANTAY GARNER, I.D. NO. 1503016511

State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

._____

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

No.

Event Date Docket Add Date

Judge

Event

DEAR MR. VEITH:

IN RESPONSE TO YOUR LETTER DATED SEPTEMBER 29, 2015 THE STATE PROVIDES THE FOLLOWING:

THE DEFENDANT'S RECORDED STATEMENT WAS PROVIDED TO YOU ON 7/28/15 AND AGAIN IN THE STATE'S DISCOVERY PACKET 11/5/15. ALSO PROVIDED THERIN WERE THE RECORDED STATEMENTS OF THE FOLLOWING CO-DEFENDANTS.

****SEE FILE FOR FULL LETTER****

05/26/2016 28

05/26/2016

HEARING HELD REGARDING MOTION TO SEVER DEFENDANTS COURT RESERVED

05/26/2016

05/26/2016

MOTION TO SEVER, DECISION RESERVED.

05/31/2016 05/31/2016

PARKER LYNNE M

ARRAIGNMENT CALENDAR - DEFENDANT WAIVED READING; ENTERED PLEA OF NOT GUILTY; JURY TRIAL DEMANDED.

05/31/2016 05/31/2016

PARKER LYNNE M

BAIL MODIFIED. BAIL NOW SET AT

CASH BAIL

138,000.00

HELD WITHOUT BAIL

0.00

BAIL CONDITIONS REMAIN THE SAME

05/31/2016 05/31/2016 29

PARKER LYNNE M

COMMITMENT TO DEPARTMENT OF CORRECTION.

30

07/26/2016 08/02/2016

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 7/26/2016.

RE: DUE TO THE VOLUMINOUS AMOUNT OF DISCOVERY ITEMS TO BE PROVIDED IN THE ABOVE-CAPTIONED CASE, THE STATE IS PROVIDING THE BELOW LISTED DOCUMENTS TO YOU VIA DROPBOX:

IN REGARDS TO WILMINGTON POLICE DEPARTMENT COMPLAINT 30-13-008568:

- 1. CRIME SCENE VIDEO (CONTAINING 1 FILE);
- 2. CRIME SCENE PHOTOGRAPHS (141 TOTAL);
- 3. CRIME SCENE SKETCH (1 PAGE);...
- *** SEE FULL LETTER IN FILE ***

08/03/2016 08/03/2016 31 LETTER FROM JUDGE CARPENTER TO COUNSEL CARPENTER WILLIAM C JR.

I HAVE RECENTLY REVIEWED THE TRANSCRIPTS OF THE HEARING HELD BACK IN MAY AND HAVE CONSIDERED THE VARIOUS MOTIONS TO SEVER WHICH HAVE BEEN FILED. AS A RESULT OF THIS REVIEW, THE COURT BELIEVES THE REAL ISSUE HERE IS NOT WHETHER DEFENDANTS WILL BE SEVERED OUT TO BE TRIED SEPARATELY BUT RATHER, WHICH WHOM EACH SHOULD BE GROUPED FOR TRIAL... IF A DEFENDANT IN GROUP TWO OR THREE HAS FILED A MOTION TO SEVER, THAT MOTION IS DENIED AT THIS TIME....FOR THE REASONS NOTED ABOVE, MR.

DOB: 07/21/1996 State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

Event

Event Date Docket Add Date

Judge

HAWKES'S MOTION TO SEVER IS DENIED.

SEE FULL LETTER IN FILE

08/04/2016 08/05/2016 32

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 8/4/2016.

RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16 (A)(1)(E), ENCLOSED PLEASE FIND ONE DISC CONTAINING ONE COPY OF EACH OF THE BELOW LISTED SUPPLEMENTAL ITEMS PREPARED IN CONNECTION WITH THE ABOVE REFERENCED CASE:

- 1. THE FORENSIC CASE REPORT FOR BODE CELLMARK CASE #: CCC1547-0432, DATED DECEMBER 18, 2015, PREPARED BY CHRISTINA NASH, MSFSM DNA ANALYST I, OF BODE CELLMARK FORENSICS (7 PAGES)...
- *** SEE FULL LETTER IN FILE ***

08/11/2016 08/12/2016 33

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 8/10/2016.

RE: ENCLOSED PLEASE FIND ONE DISC CONTAINING THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

- 1. ONE COPY OF THE FORENSIC FIREARMS REPORT RELATED TO COMPLAINT 33-14-005650, PREPARED BY CARL RONE, FIREARMS AND TOOL MARK EXAMINER, OF THE DELAWARE STATE POLICE FORENSIC FIREARMS UNIT, DATED NOVEMBER 11, 2015 (28 PAGES)...
- *** SEE FULL LETTER IN FILE **
- 35 08/19/2016 08/30/2016

LETTER FROM: IPEK K. MEDFORD, DAG. TO: CHRISTOPHER KOYSTE, ESQ.

RE: STATE V. ALEXANDER FITZGERALD, I.D.NO. 1503016511.

MR. KOYSTE:

ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

- 1. ONE (1) DISC CONTAINING THE OFFICE OF THE CHIEF MEDICAL EXAMINER'S ENTIRE LITIGATION PACKET FOR DNA15-48 LITIGATION PACKET;
- ****SEE FILE FOR FULL LETTER****
- 08/23/2016 08/24/2016 34

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ

RE: LETTER DATED 8/23/16.

DUE TO THE AMOUNT OF CELL PHONE EXTRACTIONS AND FILES IN THE ABOVE-CAPTIONED CASE, THE STATE IS PROVIDING THE BELOW LISTED FOLDERS AND THE EXTRACTIONS TO YOU VIA DROPBOX:

- 1. "BRISCO, JOHN HTC PHONE DUMP" CONTAINING 1,894 IMAGES AND ONE EXTRACTION REPORT (277 PAGES);
- 2. "BRISCO, RAYMIRE" CONTAINING THE CELL PHONE EXTRACTION OF ONE(1) APPLE IPHONE 5C, SERIAL NUMBER: FCCNR1DEG07M, ALSO INCLUDING BUT... ***SEE FULL LETTER IN FILE***

State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

No. Event

Event Date Docket Add Date

09/02/2016 09/08/2016

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 9/2/2016.

RE: THE BELOW LISTED REDACTED TRANSCRIPTS ARE AVAILABLE VIA THE FOLLOWING DROPBOX LINK:

HTTPS://WWW.DROPBOX.COM...

1. WITNESS A, DATED 12/02/2014 (12 PAGES);

- 2. WITNESS B, DATED 02/27/2013 (5 PAGES);
- 3. WITNESS C, DATED 02/27/2013 (9 PAGES);
- 4. WITNESS D, DATED 01/26/2015 (7 PAGES)...

*** SEE FULL LETTER IN FILE ***

09/19/2016 09/22/2016 37

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ

RE: LETTER DATED 9/16/16.

THE HEREIN PROVIDED DROPBOX LINK CONTAINS THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS:

1. THE LITIGATION PACKET FOR BODE CELLMARK FORENSICS' TESTING IN BODE CASE #CCC1547-0432, THE TESTED EVIDENCE RELATES TO WILMINGTON POLICE DEPARTMENT'S COMPLAINT NUMBERS: 30-15-003782, 30-14-035149,

30-15-005259, AND 30-15-56288. THE PROVIDED LITIGATION PACKET INCLUDES THE FOLLOWING DOCUMENTS...

SEE FULL LETTER IN FILE

09/26/2016 09/26/2016 38

CARPENTER WILLIAM C JR.

LETTER FROM: JUDGE CARPENTER TO: ALL COUNSEL OF RECORD

RE: LETTER DATED 09/23/16

ON SEPTEMBER 14, 2016, THE COURT HELD A CONFERENCE WITH COUNSEL FOR THE DEFENDANTS INITIALLY SCHEDULED TO BE IN THE FIRST TRIAL GROUPING SET FOR OCTOBER 11, 2016. BASED UPON THE INFORMATION PROVIDED TO THE COURT AT THAT CONFERENCE, THE TRIAL OF THE FIRST GROUP HAS BEEN POSTPONED TO MARCH 6, 2017....

SEE FULL LETTER IN FILE

10/03/2016 39

10/06/2016

LETTER FROM: IPEK MEDFORD, DAG TO: CHRISTOPHER KOYSTE, ESQ

RE: LETTER DATED 10/3/16.

ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS: 1. ONE(1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S LABORATORY REPORT NUMBER: 2015-01288-6, DATED SEPTEMBER 22, 2016 (13 PAGES); 2. ONE(1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S LEAD REPORT

FOR CASE ID NUMBER 281D-BA-6122070 (18 PAGES); 3. ONE(1) COPY OF THE FEDERAL BUREAU OF INVESTIGATION'S EVIDENCE DATA-

LOADING FORM FOR CASE ID NUMBER 281D-BA-6122070 (6 PAGES)... ***SEE FULL LETTER IN FILE***

DOB: 07/21/1996 State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

Event Date Docket Add Date Judge Event

11/01/2016 12/19/2016

LETTER FROM C. KOYSTE TO JUDGE CARPENTER

RE: REQUEST A BAIL HEARING TO BE SCHEDULED AT THE CONVENIENCE OF YOUR HONOR AND THE PARTIES.

11/02/2016 11/02/2016 40

RELEASE FAXED TO DOC CENTRAL RECORDS FOR NOLLE PROSSED CHARGES.

11/16/2016 11/16/2016 41 MOTION TO SUPPRESS FILED.

FILED BY CHRISTOPHER KOYSTE, ESQ

REFERRED TO JUDGE CARPENTER ON 11/16/16

11/21/2016 12/21/2016 46

LETTER FROM: DANIEL B. MCBRIDE, DEPUTY ATTORNEY GENERAL.

TO: CHRISTOPHER KOYSTE, ESQ.

STATE V. ALEXANDER FITZGERALD, ID# NO. 1503016511.

DEAR MR. KOYSTE:

IN RESPONSE TO YOUR EMAIL DATED NOVEMBER 15, 2016 THE STATE PROVIDED THE FOLLOWING:

- 1. THE DEFENDANT DID NOT PROVIDE A STATEMENT.
- 2. TRANSCRIPTS OF ANY AND ALL INTERVIEWS WILL BE PROVIDED TO DEFENSE COUNSEL AS REQUIRED BY LAW OR WHEN DEFENSE COUNSEL SIGNS THE PROPOSED PROTECTIVE ORDER.

****SEE FILE FOR FULL LETTER****

11/22/2016 12/09/2016 43

LETTER FROM: DANIEL MCBRIDE, DAG, TO: CHRISTOPHER KOYSTE, ESQ, DATED

RE: AS AN ADDITIONAL SUPPLEMENT TO YOUR EMAIL DATED NOVEMBER 15, 2016 THE STATE PROVIDES THE FOLLOWING:

- 1. ONE(1) COPY OF THE NIBIN HIT INFORMATION SHEET FOR #14-0088
- (1 PAGE); AND
- 2. ONE(1) COPY OF THE NIBIN HIT INFORMATION SHEET FOR #14-0073

(1 PAGE). 12/05/2016 42

12/05/2016

LETTER FROM: JUDGE CARPENTER TO: COUNSEL

RE: MOTION TO SUPPRESS

THE COURT ACKNOWLEDGES RECEIPT OF MR. KOYSTE'S MOTION TO SUPPRESS EVIDENCE IN THE ABOVE-CAPTIONED MATTER. MR. FITZGERALD'S CASE IS INCLUDED IN THE SECOND GROUPING OF DEFENDANTS IN THE TOUCH MONEY GANG PROSECUTION THAT WILL BE HANDLED BY THE COURT. AS SUCH, THE COURT DOES NOT BELIEVE IT WOULD BE APPROPRIATE TO ATTEMPT TO ADDRESS THE SUPPRESSION MOTION UNTIL THE FIRST GROUPING OF DEFENDANTS HAS BEEN TRIED AND A TRIAL DATE HAS BEEN SET FOR THE SECOND GROUPING... ***SEE FULL LETTER IN FILE***

SUPERIOR COURT CRIMINAL DOCKET (as of 02/01/2017)

State of Delaware v. ALEXANDER FITZGERALD

State's Atty: IPEK K MEDFORD , Esq. AKA:

Defense Atty: CHRISTOPHER S KOYSTE , Esq.

Event Date Docket Add Date

Judge

Event

12/13/2016 12/14/2016

LETTER FROM CHRIS KOYSTE, ESQ TO JOHN DOWNS, ESQ

RE: I AM WRITING IN RESPONSE TO YOU NOVEMBER 21, 2016 LETTER AS OUTLINED BELOW.....

(SEE FILE FOR FULL LETTER)

***REFERRED TO JUDGE CARPENTER ON 12/14/2016

12/16/2016 12/22/2016 47

LETTER FROM: JOHN DOWNS, DAG, TO: CHRISTOPHER KOYSTE, ESQ, DATED 12/16/16.

RE: ENCLOSED HEREIN PLEASE FIND ONE(1) DVD CONTAINING THE MARCH 24, 2015 STATEMENT OF THE DEFENDANT.

01/17/2017 01/23/2017 48

LETTER FROM: JOHN W. DOWNS, DAG TO: CHRISTOPHER KOYSTE, ESQ.

LETTER DATED: 01/13/2017

RE: ENCLOSED PLEASE FIND THE FOLLOWING SUPPLEMENTAL DISCOVERY ITEMS: 1. ONE(1) CD CONTAINING THE FOLLOWING SUPPLEMENTAL FORENSIC FIREARMS REPORTS:

1A. ONE(1) COPY OF THE FORENSIC FIREARMS REPORT LAB #160999, DATED 1/26/16 (7 PAGES);

1B. ONE(1) COPY OF THE FORENSIC FIREARMS REPORT LAB #150517, DATED 12/20/15 (8 PAGES);...

***SEE FULL LETTER IN FILE.

*** END OF DOCKET LISTING AS OF 02/01/2017 *** PRINTED BY: JDEFSEY

Page 1

DOB: 01/07/1998

SUPERIOR COURT CRIMINAL DOCKET (as of 02/01/2017)

State of Delaware v. KADIR MCCOY

AKA:

State's Atty: PERIANN DOKO , Esq. Defense Atty: ANDREW J WITHERELL , Esq.

Assigned Judge: CARPENTER WILLIAM C JR.

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Charge		Control Tout tour H	Dammintion	Diana	Diana Data
Count	DUC#	Crim.Action#	Description	Dispo.	Dispo. Date
001	1501018069	IN15020205	ROBBERY 1ST	NOLP	08/31/2015
002	1501018069	IN15020206	PFDCF	NOLP	08/31/2015
003	1501018069	IN15020207	DISGUISE	NOLP	08/31/2015
004	1501018069	N15020208	WEAP ADJ DELQ	DISM	05/05/2015
005	1501018069	IN15020209	CONSP 2ND	NOLP	08/31/2015
006	1501018069	IN15021477	ROBBERY 1ST	NOLP	08/31/2015
007	1501018069	IN15021478	PFDCF	NOLP	08/31/2015
008	1501018069	IN15021479	ROBBERY 1ST	NOLP	08/31/2015
009	1501018069	IN15021480	PFDCF	NOLP	08/31/2015
010	1501018069	IN15021481	AGGR MENACING	NOLP	08/31/2015
011	1501018069	IN15021482	PFDCF	NOLP	08/31/2015
012	1501018069	IN15021483	AGGR MENACING	NOLP	08/31/2015
013	1501018069	IN15021484	PFDCF	NOLP	08/31/2015
014	1501018069	IN15021485	CCDW	NOLP	08/31/2015
015	1501018069	IN15021486	PFBPP PABPP	NOLP	08/31/2015
016	1501018069	IN15021487	RESIST ARREST	NOLP	08/31/2015
017	1501018069	IN15021488	PFBPP PABPP	NOLP	08/31/2015
018	1501018069	IN15040944	ROBBERY 1ST	NOLP	08/31/2015
019	1501018069	IN15040945	PFDCF	NOLP	08/31/2015
020	1501018069	IN15041194	ROBBERY 1ST	NOLP	08/31/2015
021	1501018069	IN15081674	PFDCF	NOLP	11/09/2015
022	1501018069	IN15081675	ROBBERY 1ST	NOLP	11/09/2015
023	1501018069	IN15081676	PFDCF	NOLP	11/09/2015
024	1501018069	IN15081677	AGGR MENACING	NOLP	11/09/2015
025	1501018069	IN15081678	PFDCF	NOLP	11/09/2015
026	1501018069	IN15081679	AGGR MENACING	NOLP	11/09/2015
027	1501018069	IN15081680	PFDCF	NOLP	11/09/2015
028	1501018069	IN15081681	CONSP 2ND	NOLP	11/09/2015
029	1501018069	IN15081682	DISGUISE	NOLP	11/09/2015
030	1501018069	IN15081683	CCDW	NOLP	11/09/2015
031	1501018069	IN15081684	HNDGUN PROH JUV	NOLP	11/09/2015
032	1501018069	IN15081685	PFBPP PABPP	NOLP	11/09/2015
033	1501018069	IN15081686	RESIST ARREST	NOLP	11/09/2015
034	1501018069	IN15081687	HNDGUN PROH JUV	NOLP	11/09/2015
035	1501018069	IN15081688	PFBPP PABPP	NOLP	11/09/2015
036	1501018069	IN15081689	ROBBERY 1ST	NOLP	11/09/2015
037	1501018069	IN15081690	PFDCF	NOLP	11/09/2015
038	1501018069	IN15081691	PROH FIREARM	NOLP	11/09/2015
039	1501018069	IN15081792	PFDCF	NOLP	11/09/2015
040	1501018069	IN15081793	ROBBERY 1ST	NOLP	11/09/2015
041	1501018069	IN15081794	PFDCF	NOLP	11/09/2015
042	1501018069	IN15081795	AGGR MENACING	NOLP	11/09/2015
043	1501018069	IN15081796	PFDCF	NOLP	11/09/2015

No.	Event Date	Docket Add Date		Judge	
095	1501018069	IN15110901	UNDGON PROH JOV		
094	1501018069	IN15110899	HNDGUN PROH JUV		
093	1501018069		ROBBERY 1ST		
092		IN15110896 IN15110897	PFDCF		
	1501018069	IN15110895 IN15110896	CCDW		
090	1501018069	IN15110894 IN15110895	DISGUISE		
089	1501018069	IN15110893 IN15110894	CONSP 2ND		
088	1501018069	IN15110892 IN15110893	PFDCF		
087	1501018069	IN15110891 IN15110892	AGGR MENACING		
086	1501018069	IN15110890 IN15110891	PFDCF		
085	1501018069	IN15110889 IN15110890	AGGR MENACING		
084 085	1501018069	IN15110888 IN15110889	PFDCF		
083	1501018069 1501018069	IN15110887 IN15110888	ROBBERY 1ST		
082	1501018069	IN15110886	PFDCF		
081	1501018069		ROBBERY 1ST		
080	1501018069	IN15110884 IN15110885	PFDCF		
079	1501018069	IN15110883 IN15110884	HNDGUN PROH JUV		
078		IN15110882 IN15110883	PFBPP PABPP		
077	1501018069 1501018069	IN15110881 IN15110882	CONSP 1ST		
076	1501018069	IN15110880 IN15110881	HNDGUN PROH JUV		
075	1501018069	IN15110879	PFBPP PABPP		
074	1501018069		CONSP 1ST		
		IN15110877 IN15110878	MURDER 1ST		
072	1501018069	IN15110728 IN15110877	GANG PARTICP.		
071	1501018069	IN15110727 IN15110728	PFBPP PABPP		
070	1501018069	IN15110727	HNDGUN PROH JUV		
070	1501018069	IN15110725 IN15110726	RESIST ARREST		
069	1501018069	IN15001015 IN15110725	PFBPP PABPP		, , , , , , , , , , , ,
068	1501018069	IN15001042 IN15081643	PROH FIREARM	NOLP	11/09/2015
067	1501018069	IN15001011W	PFBPP PABPP	NOLP	11/09/2015
066	1501018069	IN15081641W	PROH FIREARM	NOLP	11/09/2015
065	1501018069	IN15081640W	CONSP 1ST	NOLP	11/09/2015
064	1501018069	IN15081639W	PFDCF	NOLP	11/09/2015
063	1501018069	IN15081638W	MURDER 1ST	NOLP	11/09/2015
062	1501018069	IN15081637W	GANG PARTICP.	NOLP	11/09/2015
061	1501018069	IN15081636W	PROH FIREARM	NOLP	11/09/2015
060	1501018069	IN15081635W	CONSP 1ST	NOLP	11/09/2015
059	1501018069	IN15081634W	PFDCF	NOLP	11/09/2015
058	1501018069	IN15081633W	MURDER 1ST	NOLP	11/09/2015
057	1501018069	IN15081809	ROBBERY 1ST	NOLP	11/09/2015
056	1501018069	IN15081808	HNDGUN PROH JUV	NOLP	11/09/2015
055	1501018069	IN15081807	HNDGUN PROH JUV	NOLP	11/09/2015
053	1501018069	IN15081806	PROH FIREARM	NOLP	11/09/2015
052	1501018069	IN15081805	HNDGUN PROH JUV	NOLP	11/09/2015
051	1501018069	IN15081804	RESIST ARREST	NOLP	11/09/2015
050	1501018069	IN15081803	PROH FIREARM	NOLP	11/09/2015
049	1501018069	IN15081802	HNDGUN PROH JUV	NOLP	11/09/2015
048	1501018069	IN15081801	CCDW	NOLP	11/09/2015
047	1501018069	IN15081800	DISGUISE	NOLP	11/09/2015
045	1501018069	IN15081799	CONSP 2ND	NOLP	11/09/2015
044	1501018069	IN15081797 IN15081798	PFDCF	NOLP	11/09/2015
044	1501018069	IN15081797	AGGR MENACING	NOLP	11/09/2015

Event

DOB: 01/07/1998 State of Delaware v. KADIR MCCOY

State's Atty: PERIANN DOKO , Esq. AKA:

Defense Atty: ANDREW J WITHERELL , Esq.

Judge Event Date Docket Add Date Event

02/04/2015 02/04/2015

CASE ACCEPTED IN SUPERIOR COURT.

ARREST DATE: 01/29/2015

PRELIMINARY HEARING DATE: WAIVED AT FAMILY COURT

BAIL: CASH BAIL 71,000.00

03/19/2015 03/27/2015

MOTION TO TRANSFER JUVENILE TO FAMILY COURT.

B. CHAPMAN, ESQ.

MOOT MOTION WITHDRAWN BY B. CHAPMAN, ESQ.

04/13/2015 04/20/2015

INDICTMENT, TRUE BILL FILED.NO 20

SCHEDULED FOR ARRAIGNMENT 05/05/2015 AT 9:30

CASE REVIEW 06/08/2015 AT 1:45

04/13/2015 04/27/2015

CASE CONSOLIDATED WITH: 1502001731

04/27/2015 04/27/2015

MEMORANDUM FILED, CONSOLIDATION NOTICE FAXED TO NEW CASTLE COUNTY DETENTION CENTER.

05/05/2015 05/05/2015

ARRAIGNMENT CALENDAR - DEFENDANT WAIVED READING; ENTERED PLEA OF NOT GUILTY; JURY TRIAL DEMANDED BY CONFLICT COUNSEL TO BE ASSIGNED.

05/05/2015

05/05/2015

BAIL MODIFIED. BAIL NOW SET AT

CASH BAIL

71,000.00

VAVALA MARK S

VAVALA MARK S

(NONE)

05/05/2015 05/05/2015 VAVALA MARK S COMMITMENT TO DEPARTMENT OF CORRECTION. BAIL IS NOW SET AT \$71,000.00

CASH.

05/27/2015

2

05/27/2015

SCHEDULING ORDER ISSUED

THE FOLLOWING COURT DATES ARE ESTABLISHED:

- (A) FIRST CASE REVIEW 06/08/2015
- (B) FINAL CASE REVIEW 09/14/2015
- (C) TRIAL 09/29/2015
- 06/01/2015 06/02/2015

LETTER FROM: PERIANN DOKO, DAG TO: BRIAN CHAPMAN, ESQ, DATED 6/1/2015 RE: PURSUANT TO SUPERIOR COURT CRIMINAL RULE 16, THE FOLLOWING INFORMATION CONCERNING THE ABOVE-CAPTIONED CASE IS BEING SUPPLIED. ANY SUPPLEMENTS REQUIRED BY RULE 16 WILL BE PROVIDED AS STATED BELOW...

- INITIAL CRIME REPORT, DATED 1/29/2015, CPL. WARNER, 4 PAGES.
- SUPPLEMENTAL REPORT, DATED 1/29/2015, CPL. REISS, 1 PAGE.
- SUPPLEMENTAL REPORT, DATED 1/29/2015, CPL. MARTINEZ, 1 PAGE.

DOB: 01/07/1998

State of Delaware v. KADIR MCCOY

State's Atty: PERIANN DOKO , Esq.

AKA:

Defense Atty: ANDREW J WITHERELL , Esq.

Event Date

Docket Add Date

Judge

Event ______

- SUPPLEMENTAL REPORT, DATED 1/29/2015, CPL. MILLER, 1 PAGE. *** SEE FULL LETTER IN FILE ***

06/05/2015 06/08/2015

EMAIL FILED TO: P. DOKO, AG AND B. CHAPMAN, ESQ.

RE: AN AMENBILITY HEARING IS SCHEDULED ON JULY 7, 2015.

AT 11:00.

06/15/2015

06/15/2015

CARPENTER WILLIAM C JR.

CASE REVIEW CALENDAR: SET FOR FINAL CASE REVIEW.

06/19/2015 06/30/2015 9

EMAIL FILED TO: PROTHONOTARY'S OFFICE FROM MR. CHAPMAN, ESQ.

RE: MR. CHAPMAN IS UNAVILABLE FOR THE 07/07/15 AMENABILITY

HEARING DUE TO OTHER COURT OBLIGATIONS.

06/30/2015 06/30/2015 10

EMAIL FILED TO: COUNSEL FROM THE PROTHONOTARY'S OFFICE

RE: THE AMENABILITY HEARING HAS BEEN RESCHEDULD TO

09/03/15 AT 9:00.

08/27/2015 08/28/2015

SUBPOENA(S) ISSUED. (29)

11

08/31/2015 09/01/2015

REINDICTMENT - TRUE BILL FILED.NO 100

RULE 9 WARRANT ISSUED UNDER CASE#1508021869 (CG)

08/31/2015 09/08/2015

CASE CONSOLIDATED WITH: 1508021869

08/31/2015 09/08/2015

CASE CONSOLIDATED WITH: 1502001731

12

09/01/2015 09/01/2015

EMAIL FILED TO: JUDGE MEDINILLA FROM B. CHAPMAN, ESQ.

RE: ON BEHALF OF KADIR MCCOY - THE MOTION FOR REVERSE AMENBILITY IS FORMALLY WITHDRAWN - AS A RESULT OF THE

NEW INDICTMENT WHICH WAS RETRUNED BY THE GRAND JURY

ON AUGUST 31, 2015.

14 09/01/2015

09/08/2015

SUBPOENA(S) SERVED BY SHERIFF ON PERLA GUERRERO.

PERSONALLY

13 09/03/2015 09/04/2015

MEMO SPECIALLY ASSIGNING MURDER CASE.

TO: JUDGE CARPENTER

THE ABOVE NON-CAPITAL 1ST DEGREE MURDER CASES ARE SPECIALLY ASSIGNED TO YOU FOR ALL PURPOSES UNTIL FINAL DISPOSITION. THE DEFENDANTS WERE INDICTED ON AUGUST 31, 2015.

THE HONORABLE JAN R. JURDEN

09/03/2015 09/08/2015 15